

EXHIBIT MM

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Huong Hoang,) No. 2:11-CV-01709-MJP
)
Plaintiff,) Volume 2
) Pages 403 - 518
vs.)
)
Amazon.com, Inc., et al.,)
)
Defendants.)
_____)

PURSUANT TO PROTECTIVE ORDER, PORTIONS OF THIS TRANSCRIPT
DESIGNATED ATTORNEYS EYES ONLY and CONFIDENTIAL
(SEE INDEX PAGE)

DEPOSITION OF:

HUONG HOANG aka JUNIE HOANG
Tuesday, August 7, 2012
11:01 a.m.

Reported by:

MONICA T. VOGELBACHER
CSR No. 6406

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8 APPEARANCES:

9

10 For Plaintiff:

11

12 DOZIER INTERNET LAW, P.C.

13 BY: DOV SZEGO

14 Attorney at Law

15 11520 Nuckols Road, Suite 101

17 (804) 346 9770

18 dov@cybertriallawyer.com

19

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1 APPEARANCES: (Continued)

2

3 For Defendants:

4

5 PERKINS COIE LLP

6 BY: BREENA M. ROOS

7 Attorney at Law

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9 Seattle, Washington 98101

10 (206) 359-8000

11 broos@perkinscoie.com

12

13 Also Present:

14

15 KIRILL DAVIDOFF, Videographer

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3 WITNESS:

EXAMINATION

4 HUONG HOANG aka JUNIE HOANG

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12 E X H I B I T S

13

DEFENDANT

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17 *	Confidential exhibits	
18		
19	INFORMATION REQUESTED	
20	(None)	
21		
22		
23	QUESTION INSTRUCTED NOT TO ANSWER	
24	(None)	
25		

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1 Los Angeles, California; Tuesday, August 7, 2012

2 11:01 a.m. - 1:10 p.m.

3

4 THE VIDEOGRAPHER: Here begins videotape number

11:01 5 1, Volume 2, in the deposition of Huong Hoang aka Junie
6 Hoang, in the matter of Hoang versus Amazon, in the
7 United States District Court, Western Division -- Western
8 District of Washington at Seattle. The case number is
9 2:11-CV-01709-MJP.

11:01 10 Today's date is August 7th, 2012. The time on
11 the video monitor is 11:01 a.m.

12 The videographer today is Kirill Davidoff, a
13 Notary Public contracted by Merrill Legal Solutions, at
14 20750 Ventura Boulevard, Suite 205, Woodland Hills,
11:02 15 California, 91364.

16 This video deposition is taking place at Perkins
17 Coie, 88 -- 1888 Century Park East, Suite 1700, Los
18 Angeles, 90067, and it was noticed by defense counsel of
19 Perkins Coie.

11:02 20 Counsel, please identify yourselves and state
21 whom you represent.

22 MS. ROOS: Breena Roos from Perkins Coie on
23 behalf of Amazon.com, Inc. and IMDb.com, Inc.

24 MR. SZEGO: Dov Szego from Dozier Internet Law
11:02 25 on behalf of the plaintiff Huong Hoang.

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1 THE VIDEOGRAPHER: The court reporter today is
2 Monica Vogelbacher of Merrill Legal Solutions.

3 Would the reporter please swear in the witness.

4 (Witness sworn.)

11:03 5 THE WITNESS: I do.

6 THE REPORTER: Please proceed.

7

8 HUONG HOANG aka JUNIE HOANG,

9 having been first duly sworn, was examined and testified
0 as follows:

11

12 EXAMINATION

13 BY MS. ROOS:

14 Q Can you please state your name for the record.

11:03 15 A Huong Hoang.

16 Q Ms. Hoang, we took your deposition previously,
17 correct?

18 A Yes.

19 Q On July 26th.

11:03 20 A Yes.

21 Q So do you understand that you are here today as
22 a continuation of that deposition?

23 A Yes.

24 Q And you'll recall that outside of that
11:03 25 deposition, we talked about all the protocols for

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1 THE REPORTER: 47.

2 (Defendant Exhibit 47 was marked

3 for identification by the reporter.)

4 BY MS. ROOS:

11:07 5 Q I'm handing you what's been marked as Exhibit
6 47.

7 Do you recognize this document?

8 A Yes.

9 Q And what is it?

11:07 10 A Can I look through the whole thing?

11 Q Yes, you can.

12 A Okay.

13 (Following material designated CONFIDENTIAL.)

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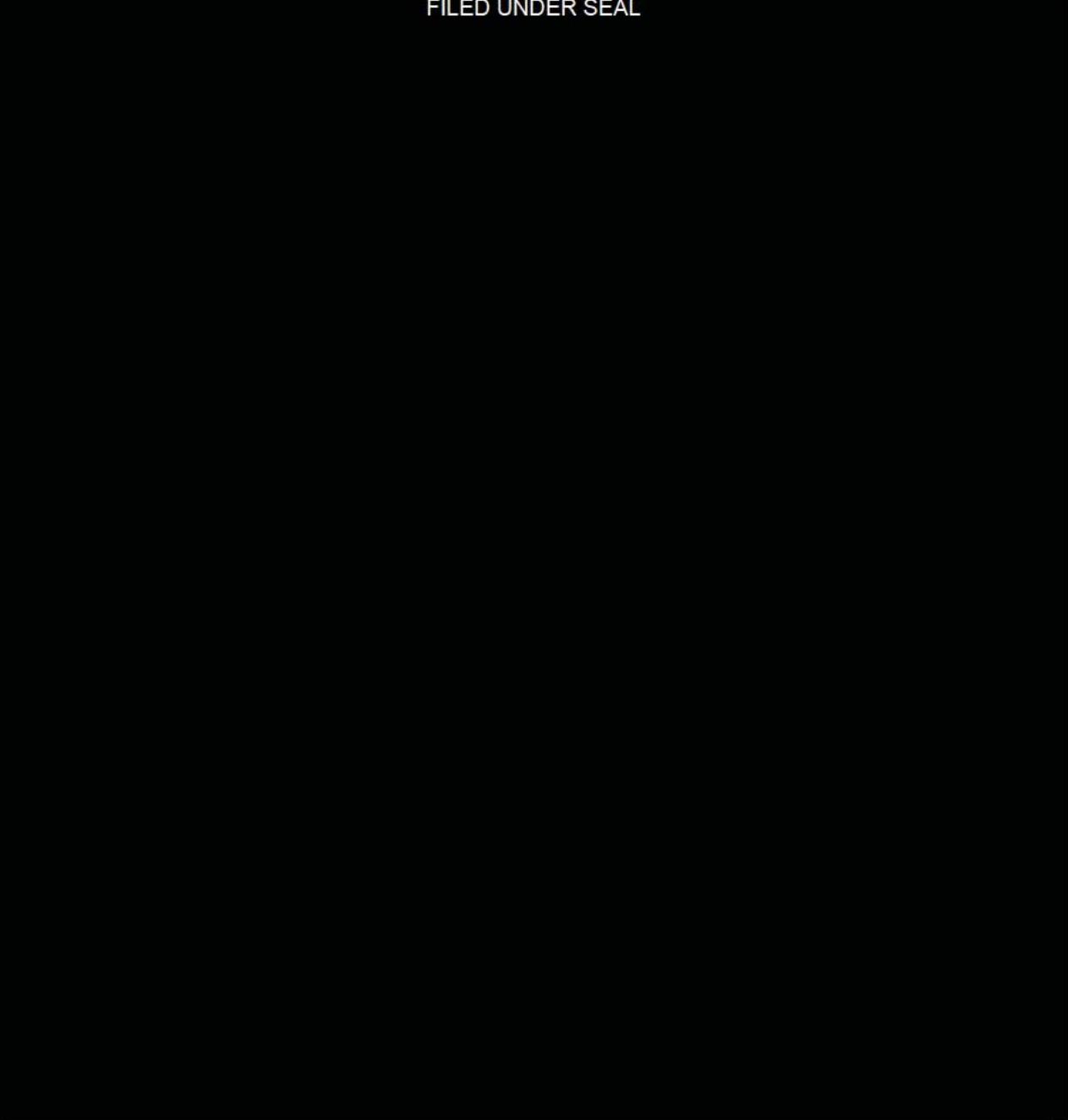
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BY MS. ROOS:

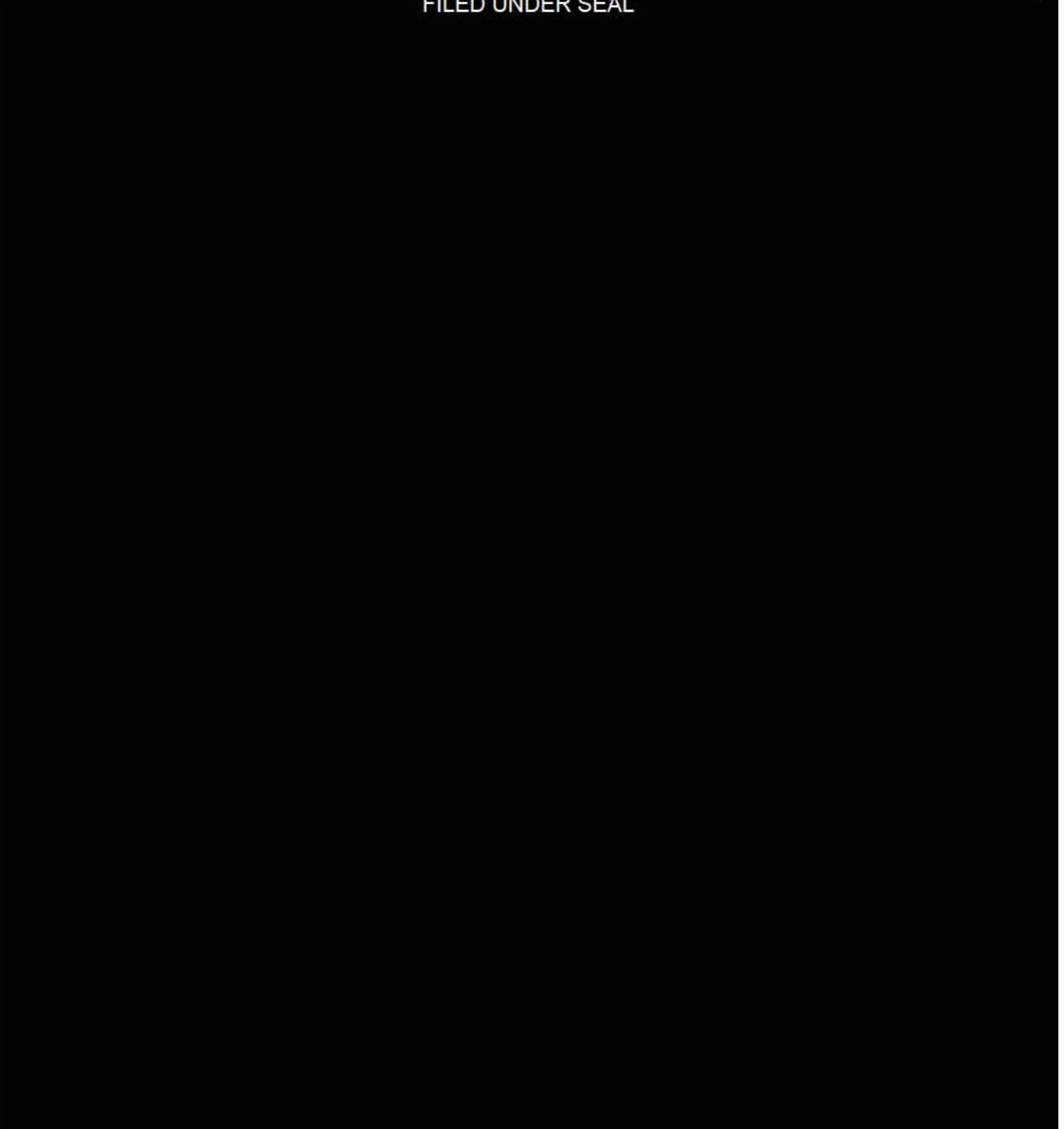
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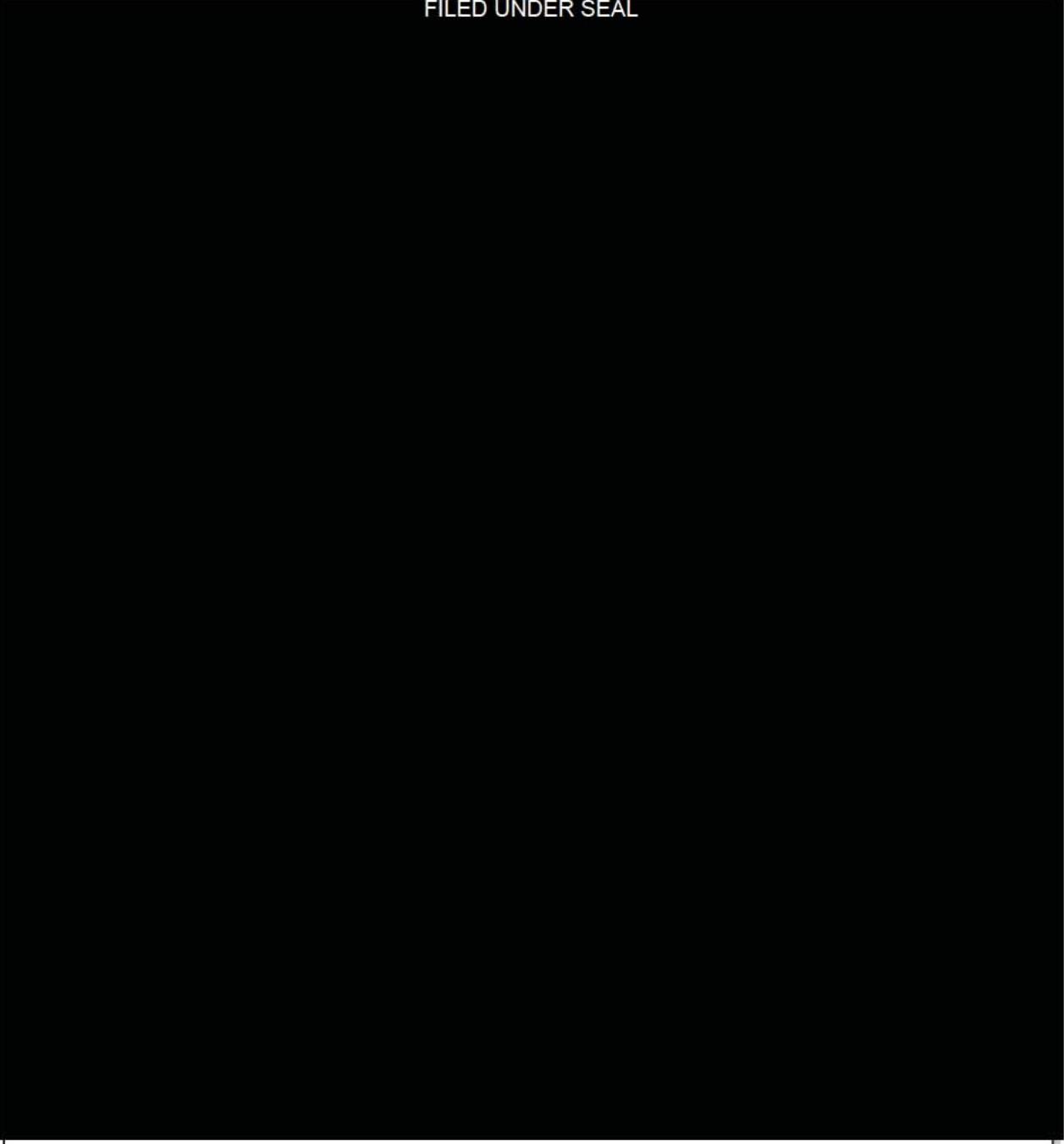
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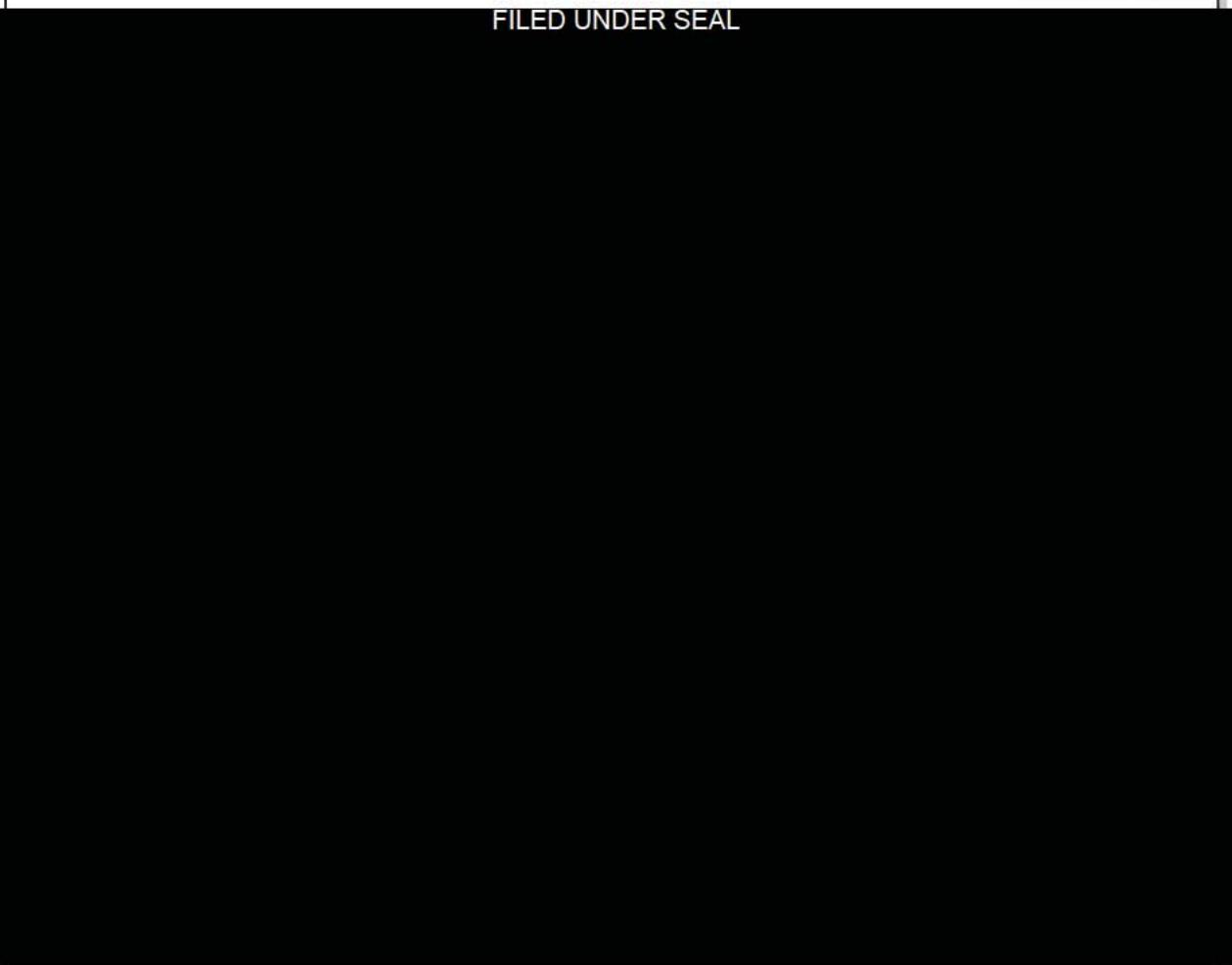
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18 (End of CONFIDENTIAL material.)

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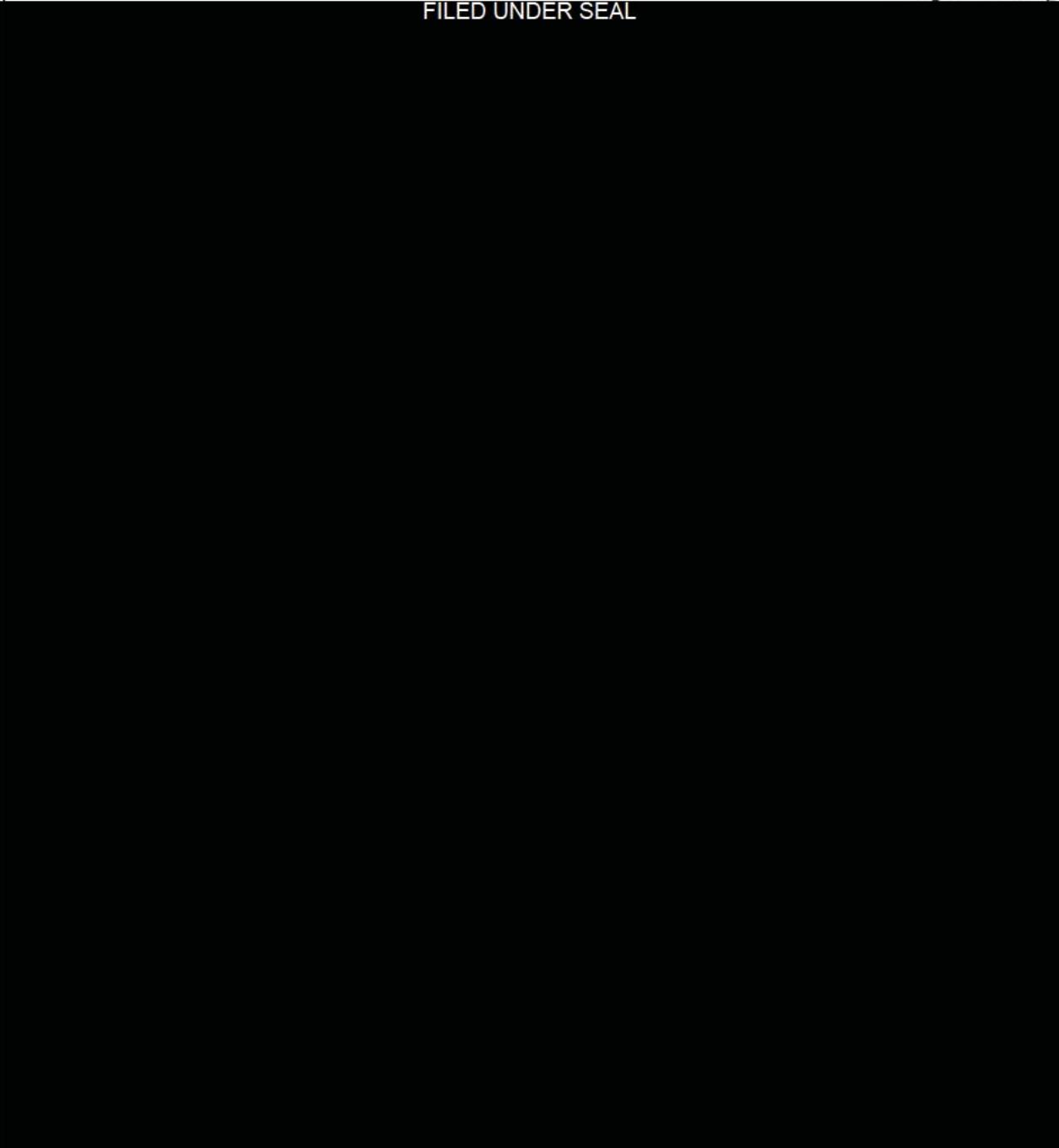
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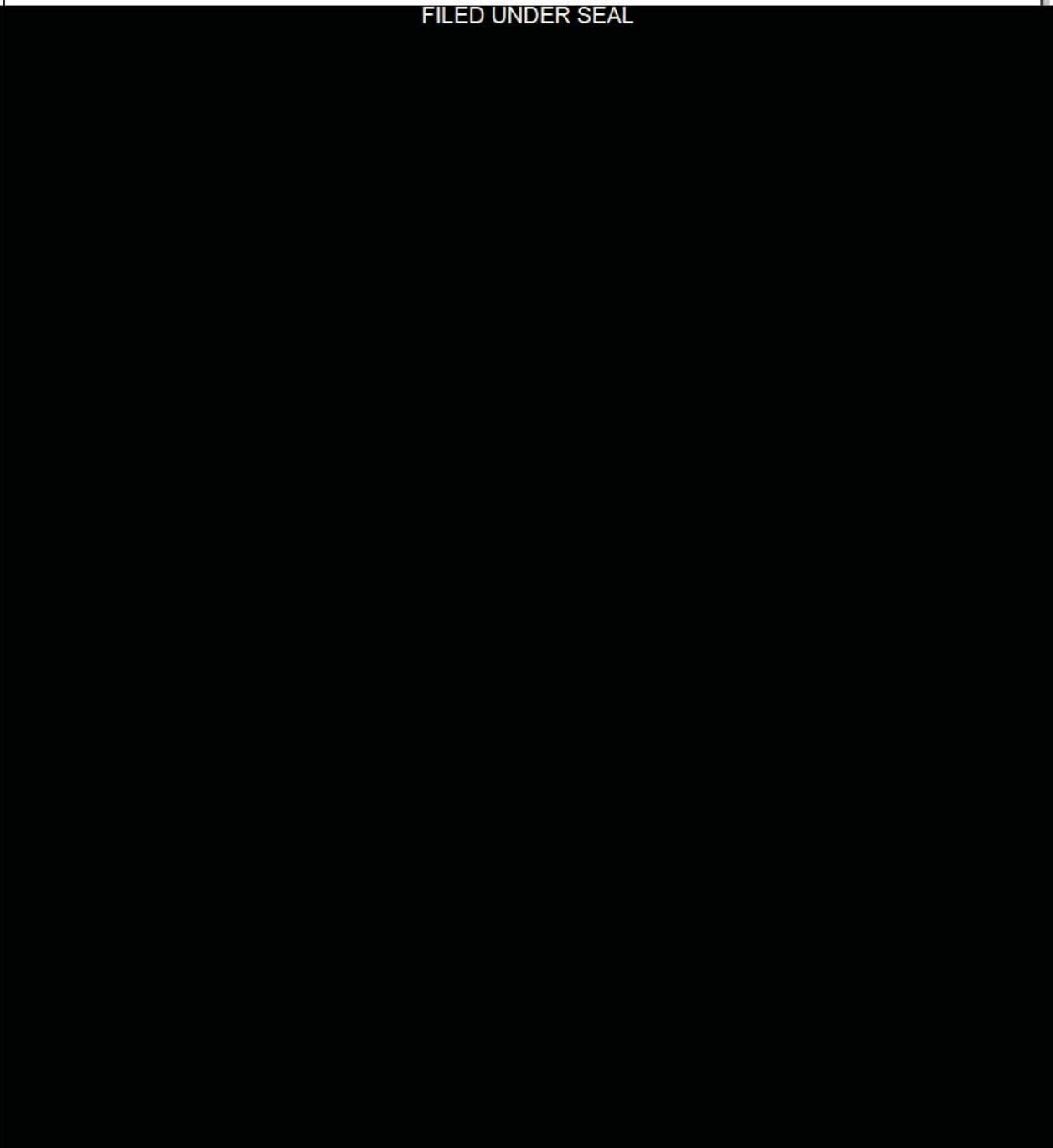
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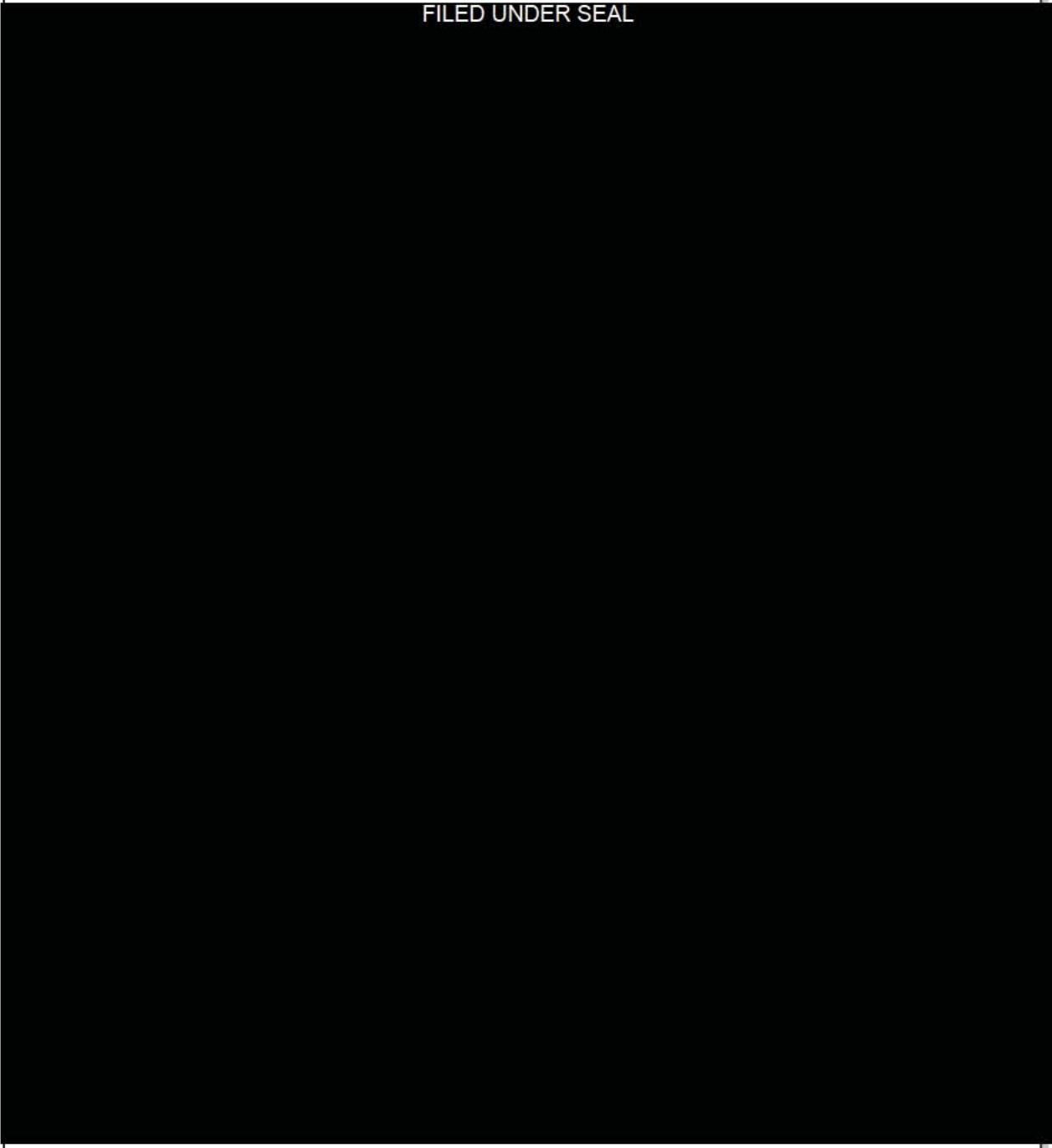
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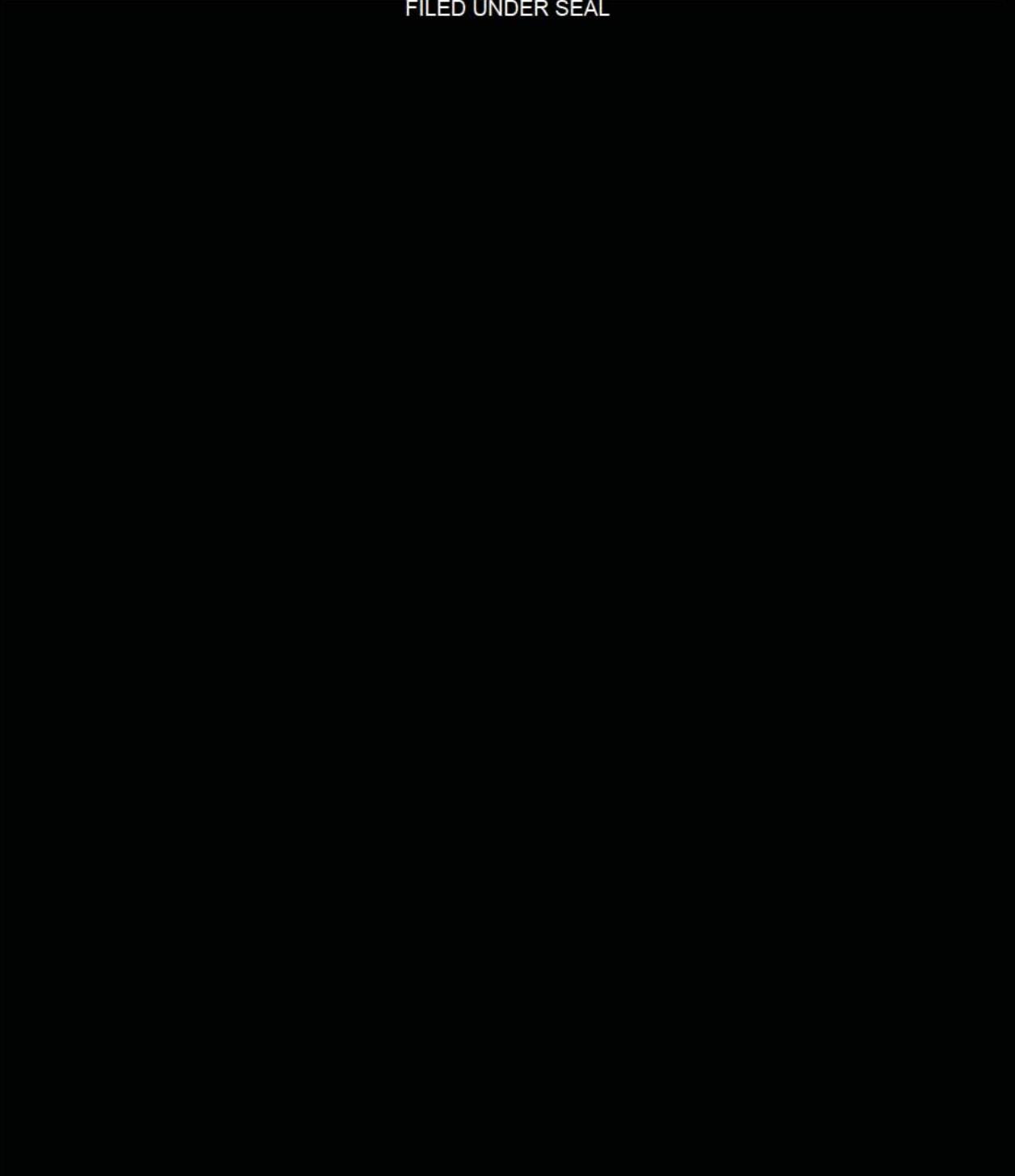
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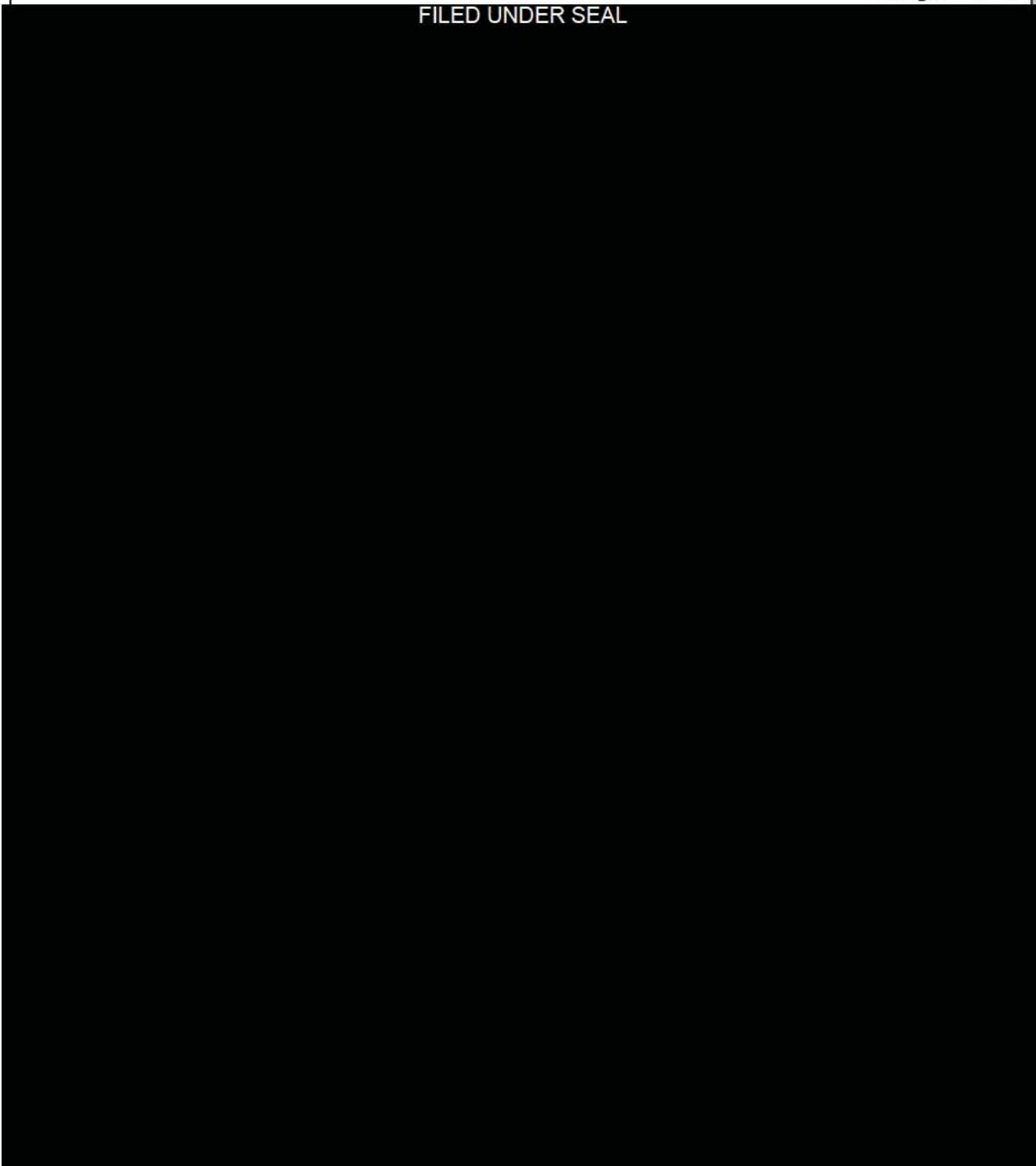
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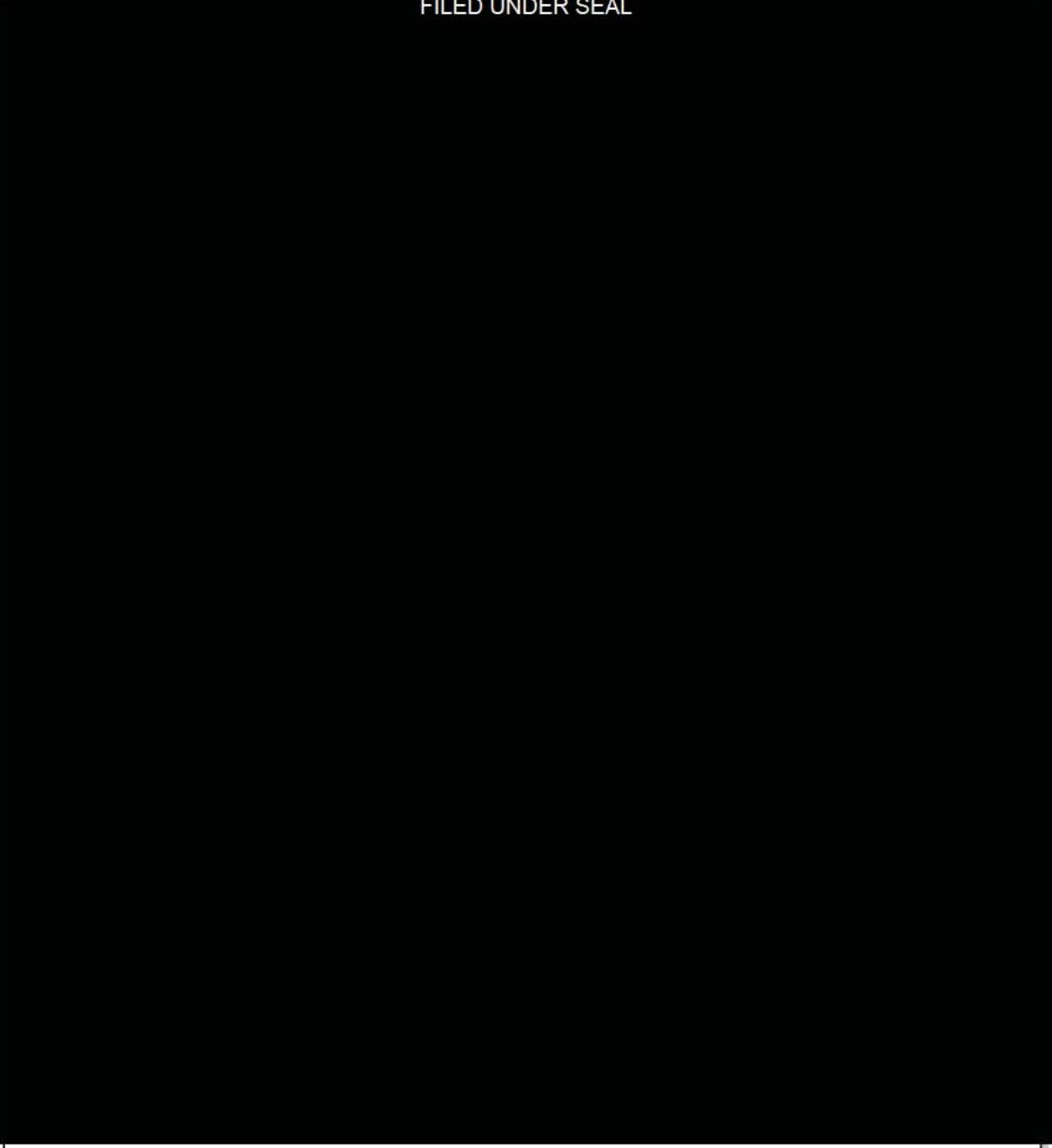
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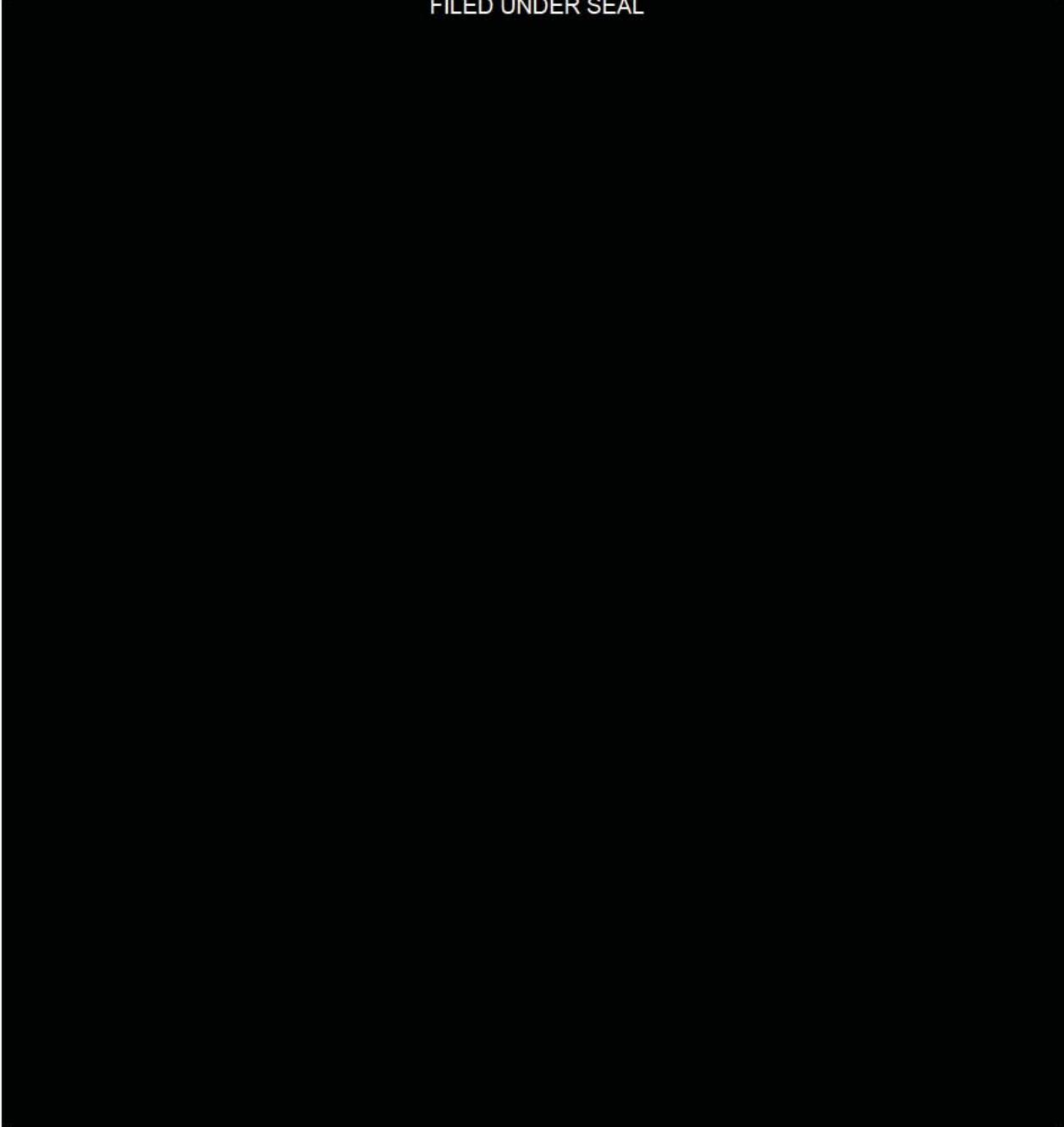
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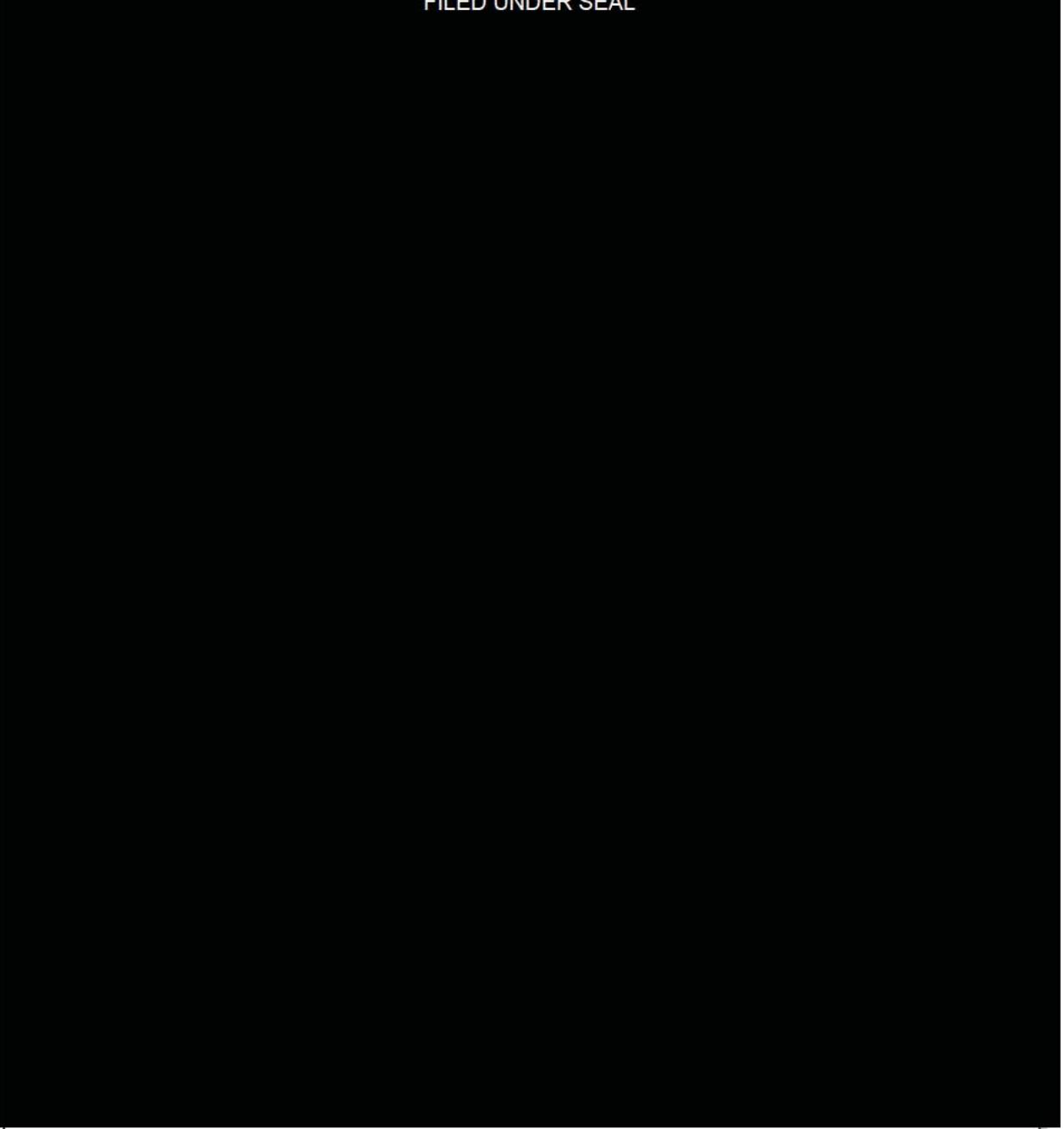
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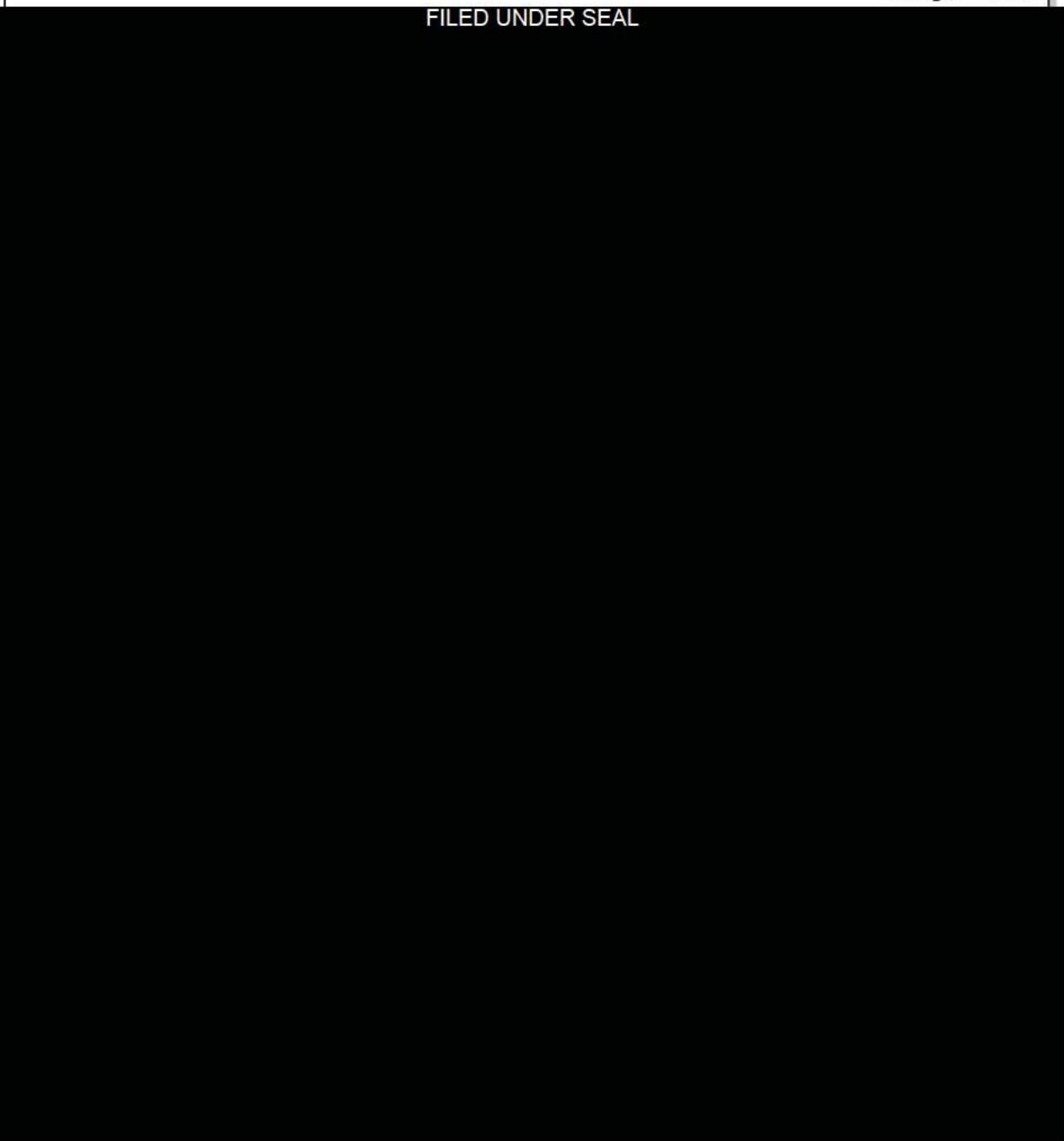
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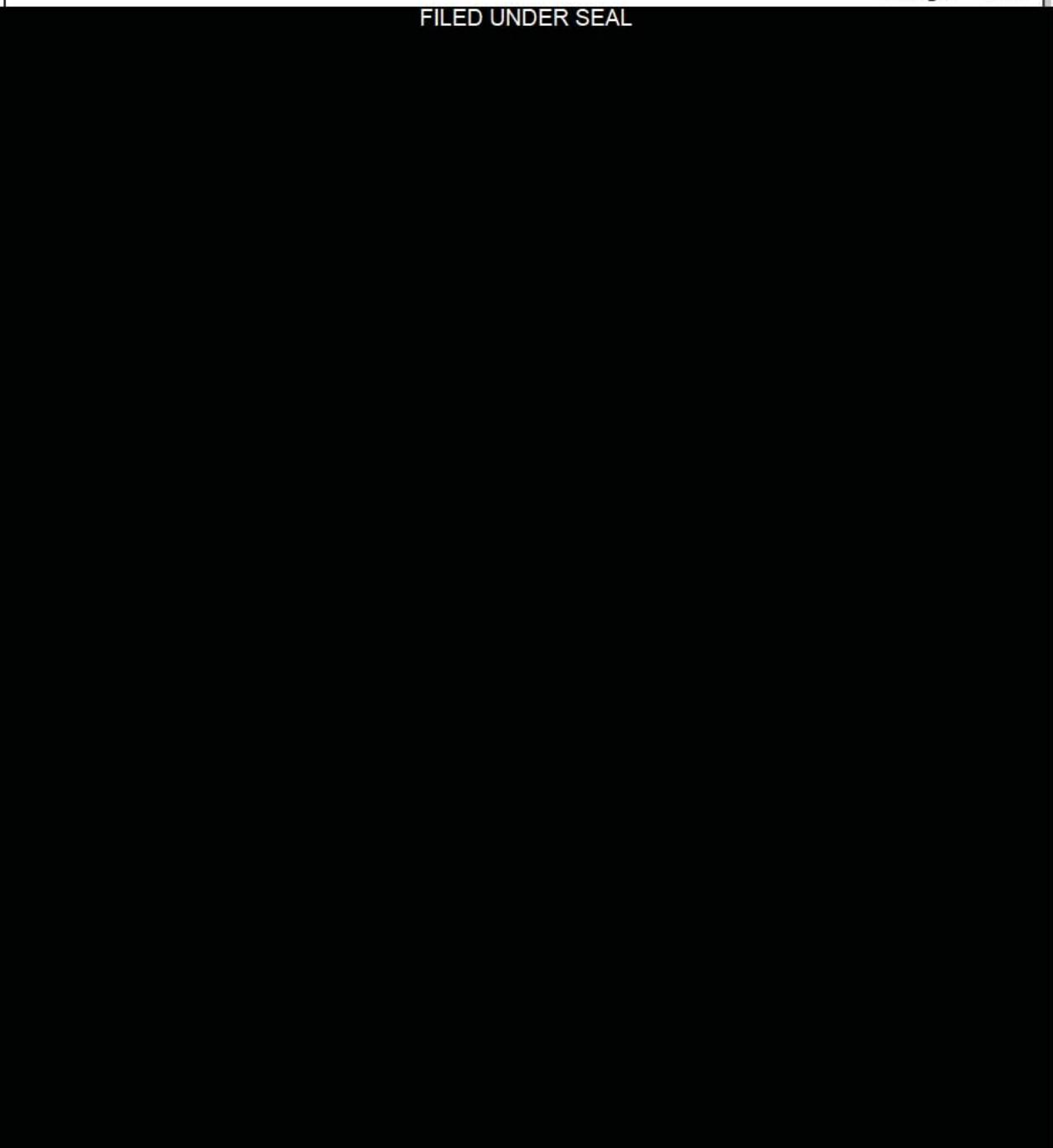
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11:33 20 (End of CONFIDENTIAL material.)

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1 BY MS. ROOS:
2 Q Have you seen this document before?
3 A Yes.
4 Q And what is it?
11:34 5 A This is the second set of interrogatories.
6 Q And it's your first response to those; is that
7 right?
8 A I believe it's the first response to my second
9 set of interrogatories, yeah.
11:34 10 Q Okay. If you could turn to the next-to-the-last
11 page for me.
12 A Okay.
13 Q The next-to-the-last page is a verification page
14 with a signature on it.
11:34 15 Is that your signature?
16 A Yes.
17 Q And it's dated August 2nd, 2012?
18 A Yes.
19 Q So at the time that you signed this, were these
11:34 20 responses accurate?
21 A At that time, yes.
22 Q So can you turn to your response to
23 interrogatory number 13, which is on page 6.
24 A You gave me the page number. I was looking for
11:35 25 the interrogatory. Okay.

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1 (Following material designated CONFIDENTIAL.)

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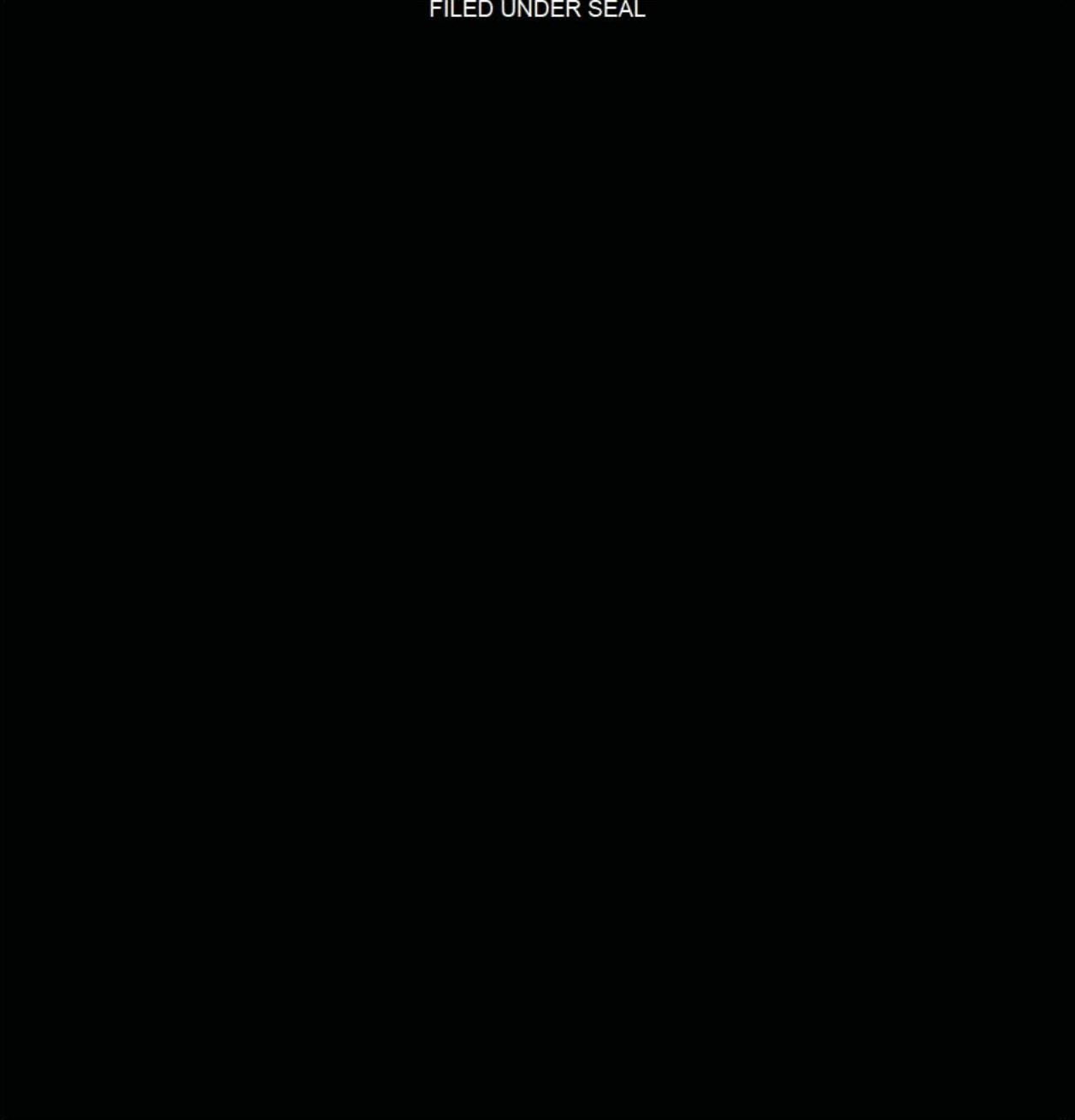
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1 BY MS. ROOS:

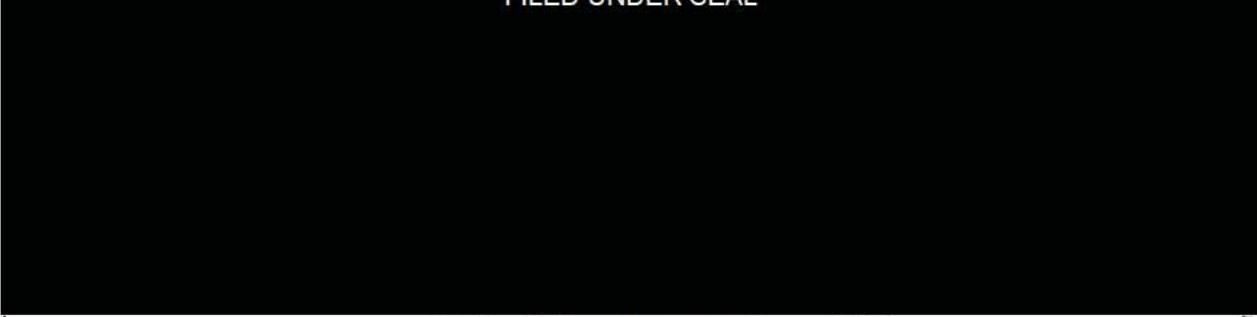
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7 (End of CONFIDENTIAL material.)

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1 BY MS. ROOS:

2 Q You signed these interrogatories, correct?

3 A Yes.

4 (Following material designated CONFIDENTIAL.)

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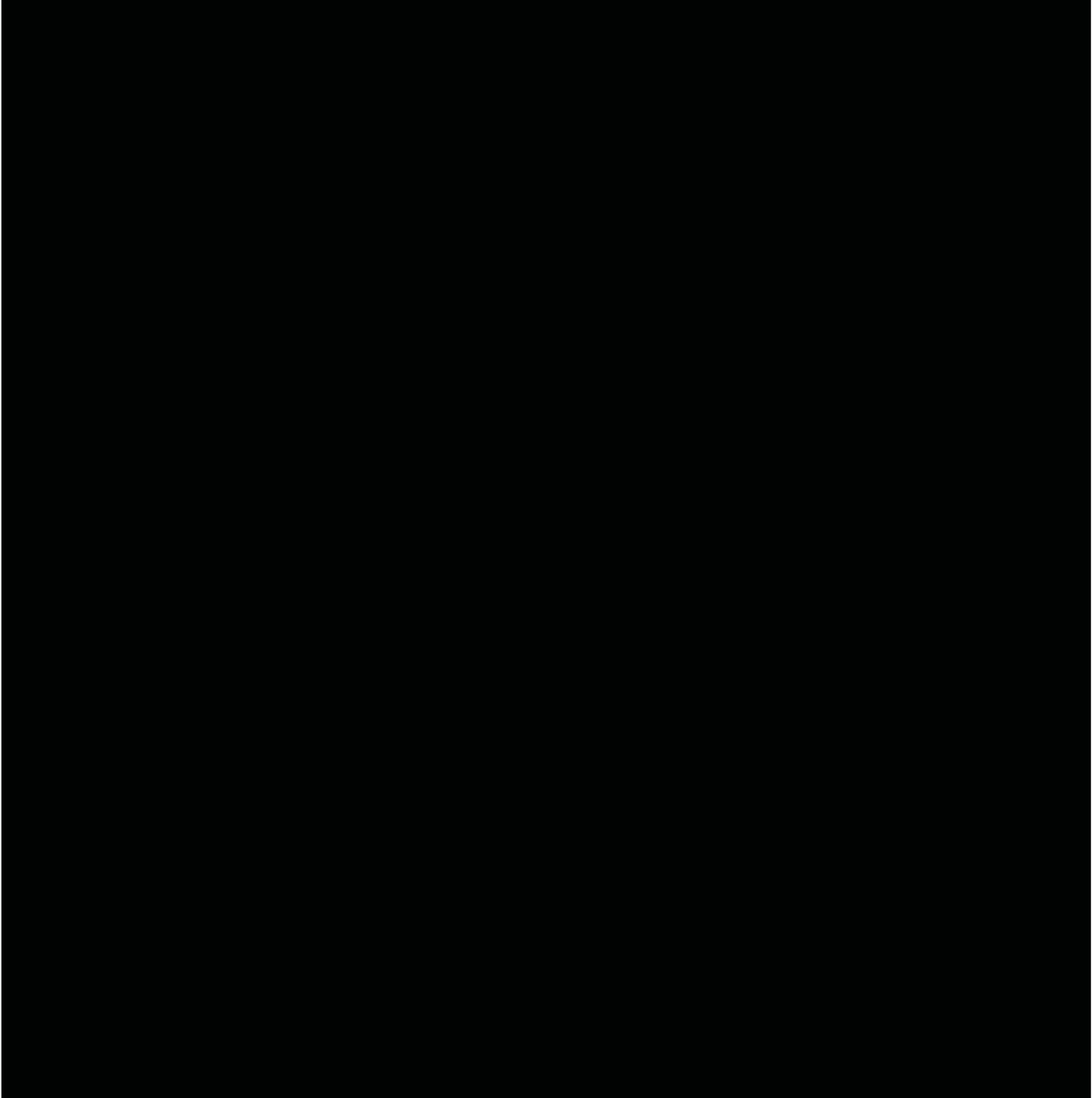
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1 BY MS. ROOS:

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11:38 10

(End of CONFIDENTIAL material.)

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1 (Defendant Exhibit 57 was marked
2 for identification by the reporter.)

3 BY MS. ROOS:

4 Q You've been handed what's been marked as Exhibit
11:38 5 57.

6 I'll give you a moment to take a look at the
7 document.

8 A Okay.

9 Q What is this document?

11:39 10 A This is the amended interrogatories.

11 Q So it's your amended response to the second set
12 of interrogatories --

13 A Yes.

14 Q -- is that right?

11:39 15 Okay. Can you turn to the next-to-the-last page
16 of the document.

17 The next-to-the-last page has a signature on it.

18 Is that your signature?

19 A Yes.

11:39 20 Q And it's dated August 6th, 2012?

21 A Yes.

22 Q So as of August 6th, 2012, are your responses to
23 these interrogatories complete and accurate?

24 A Yes.

11:39 25 (Following material designated CONFIDENTIAL.)

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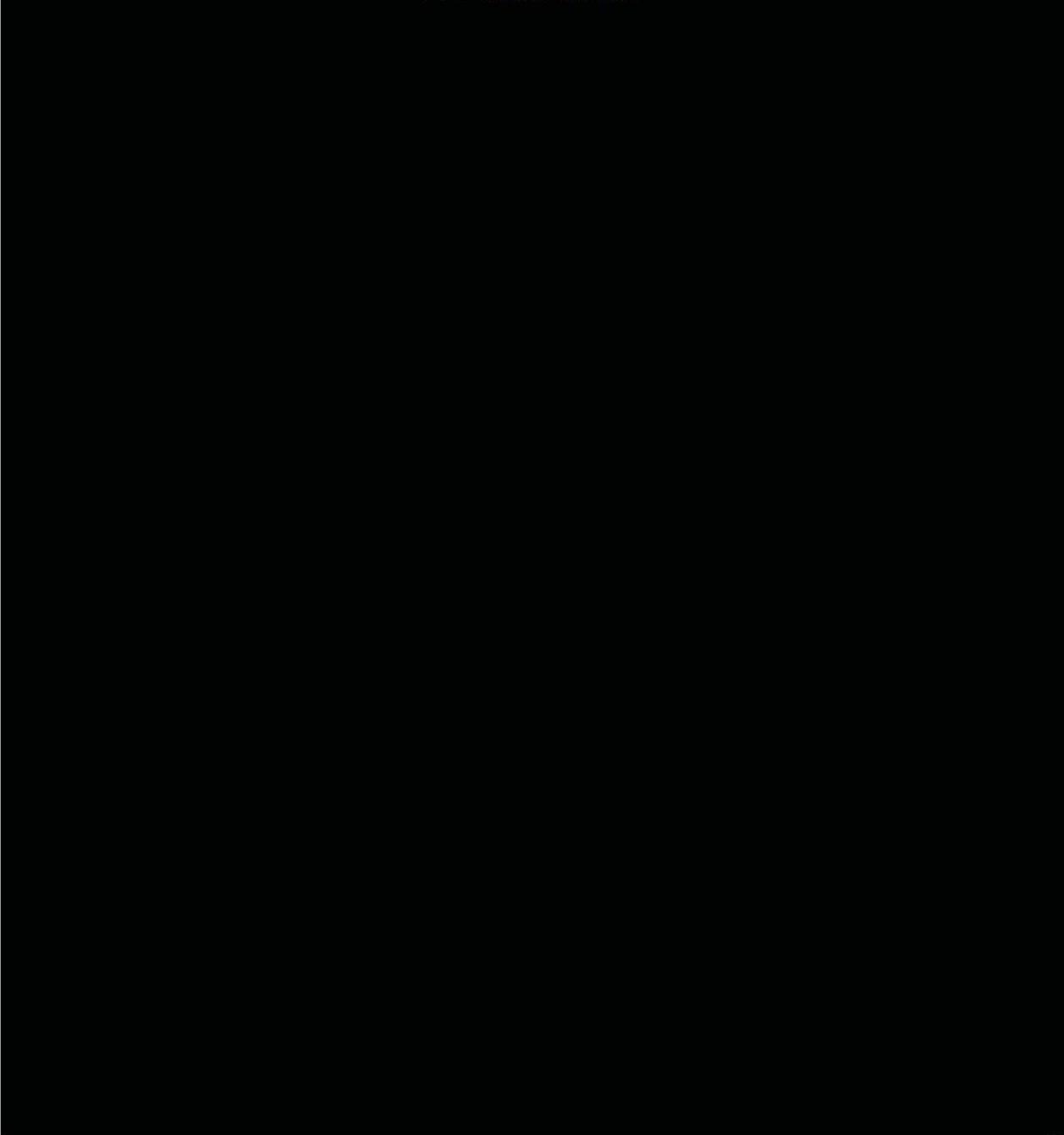
1 BY MS. ROOS:

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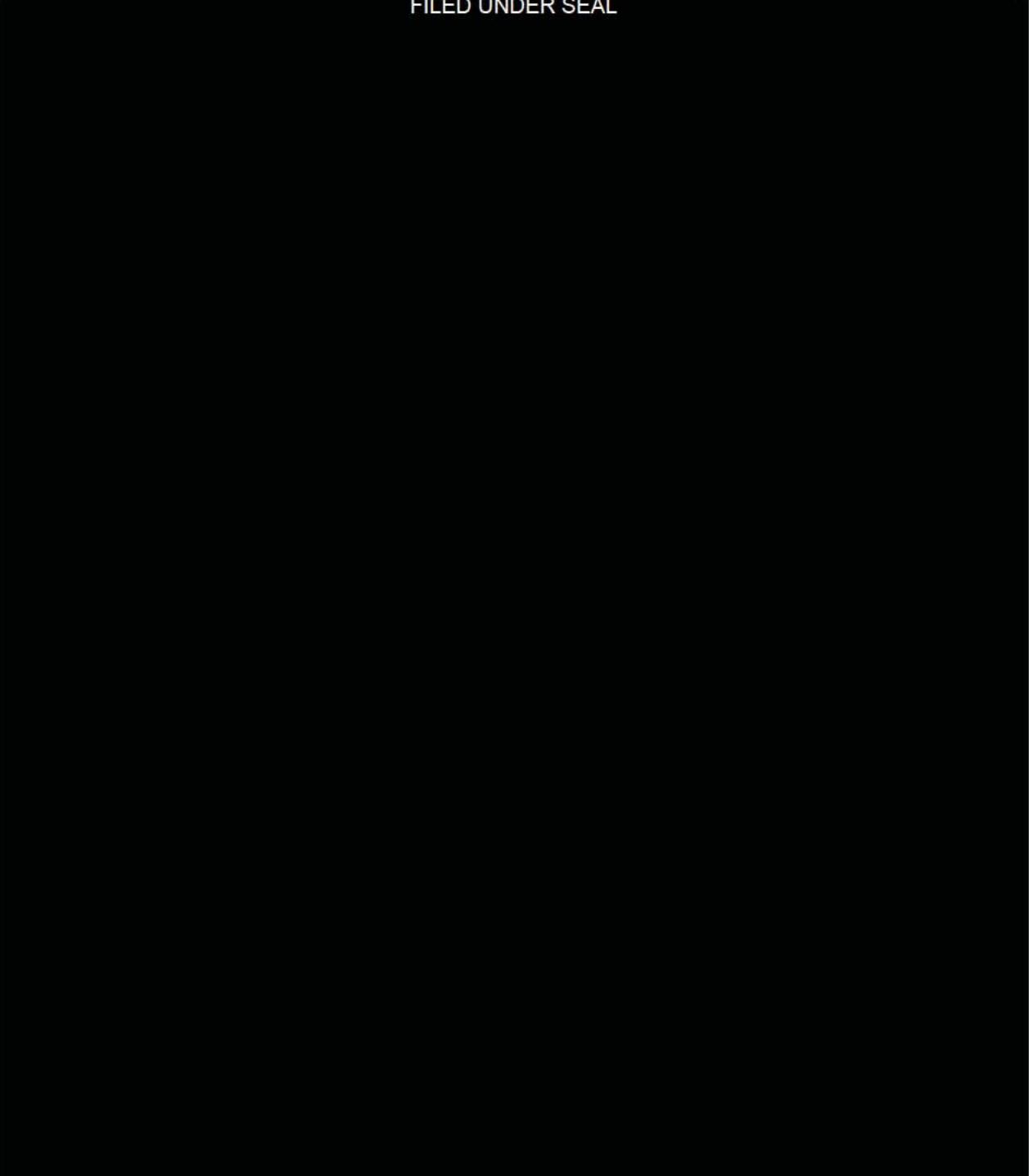
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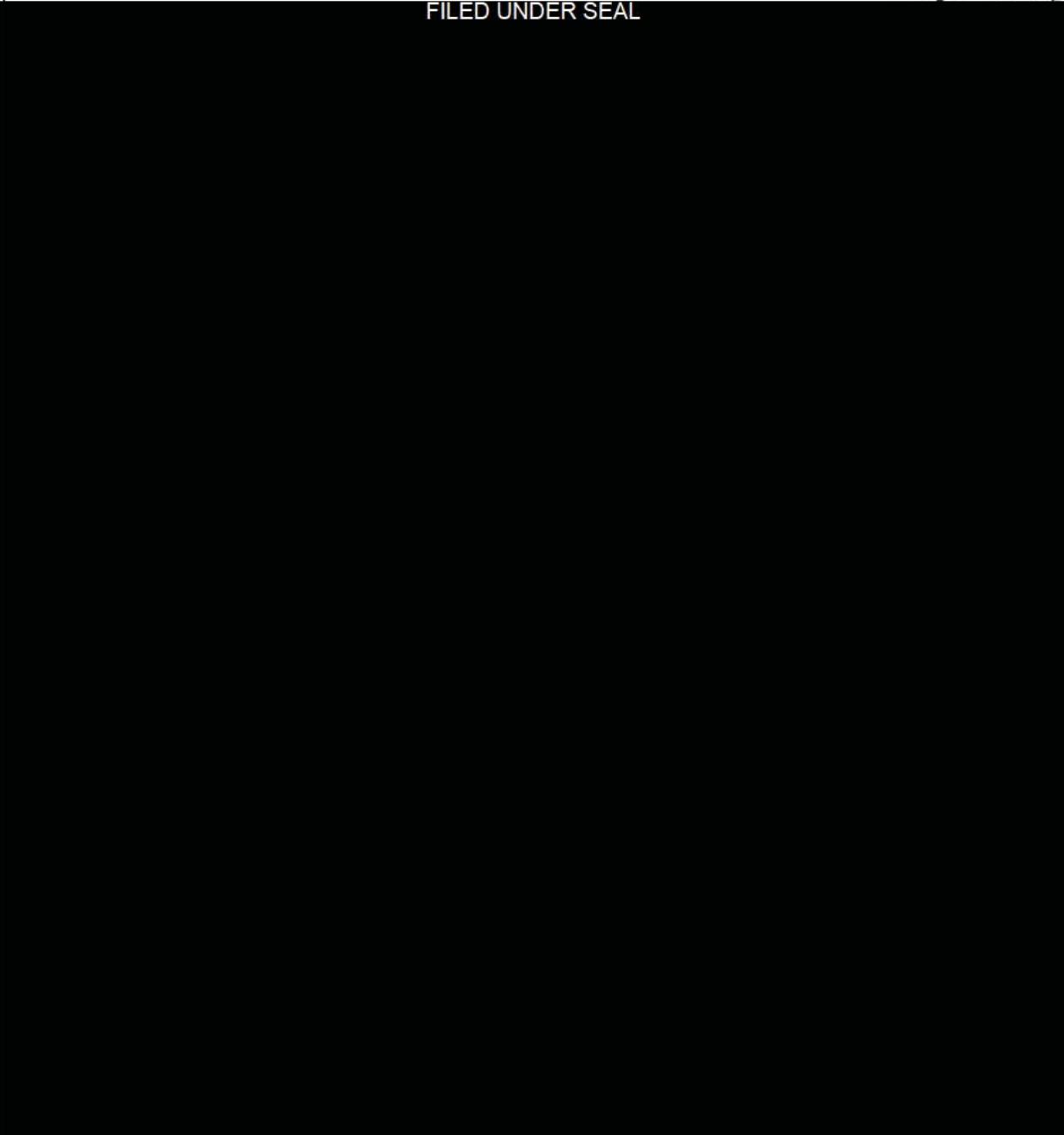
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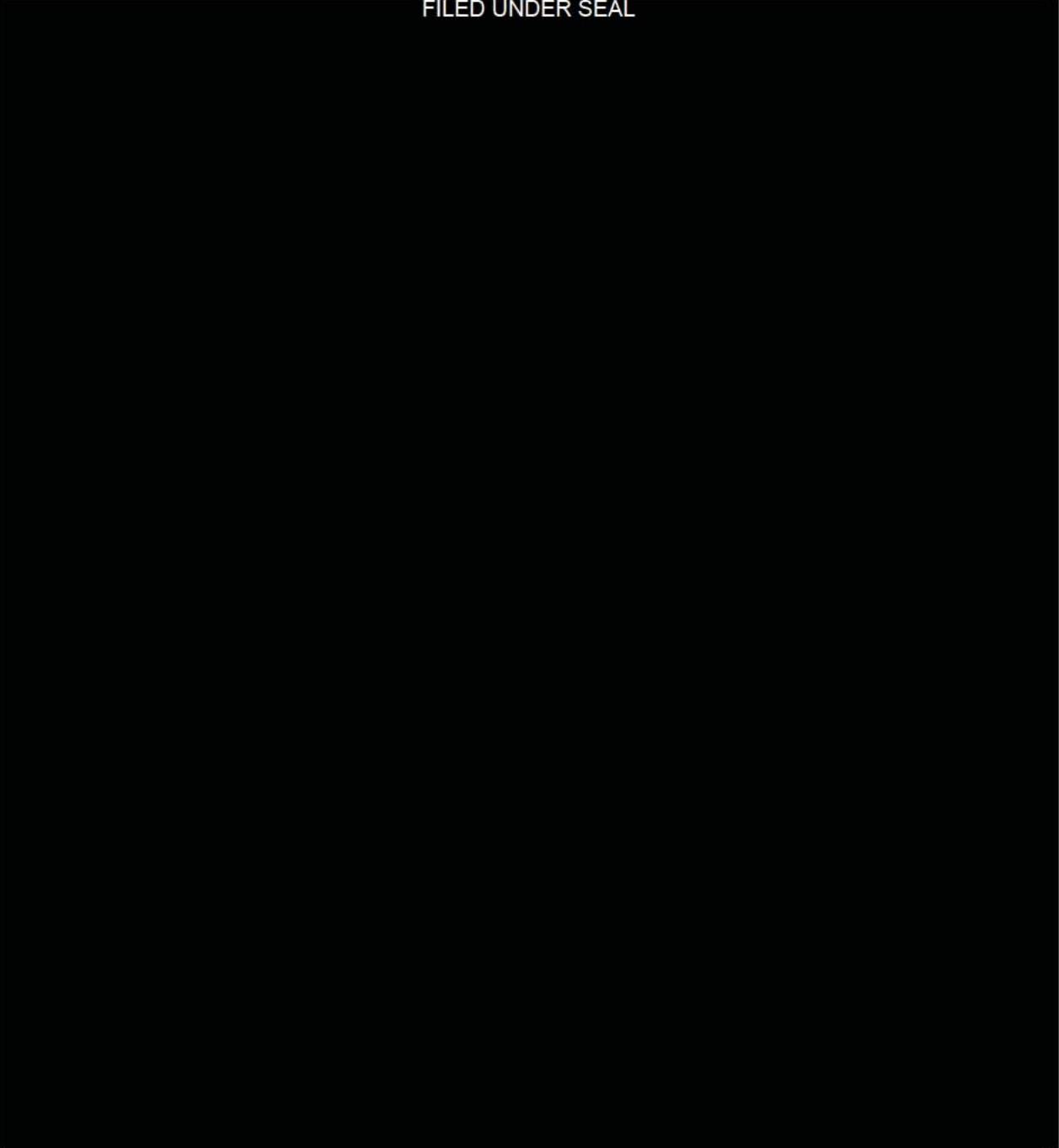
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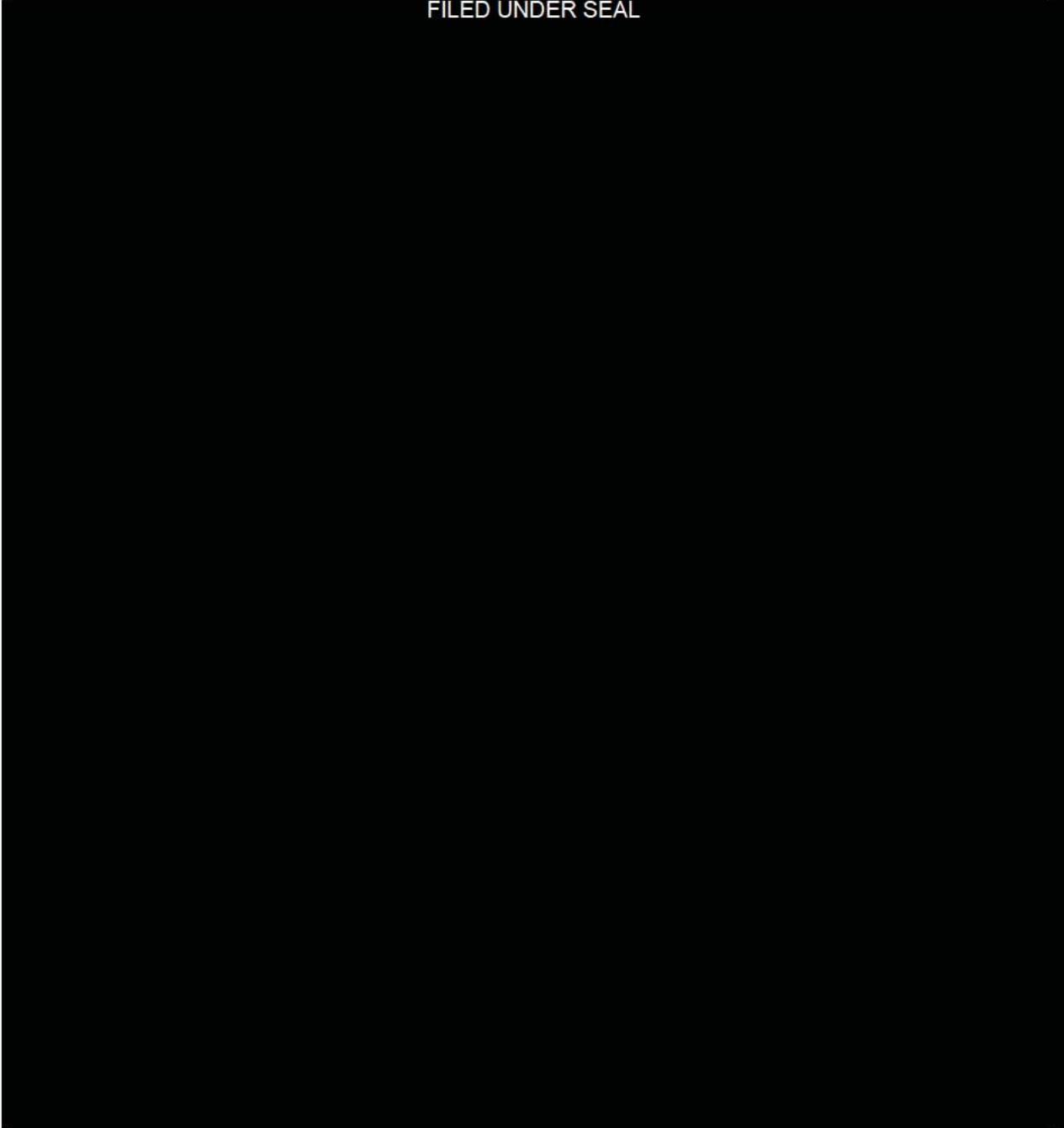
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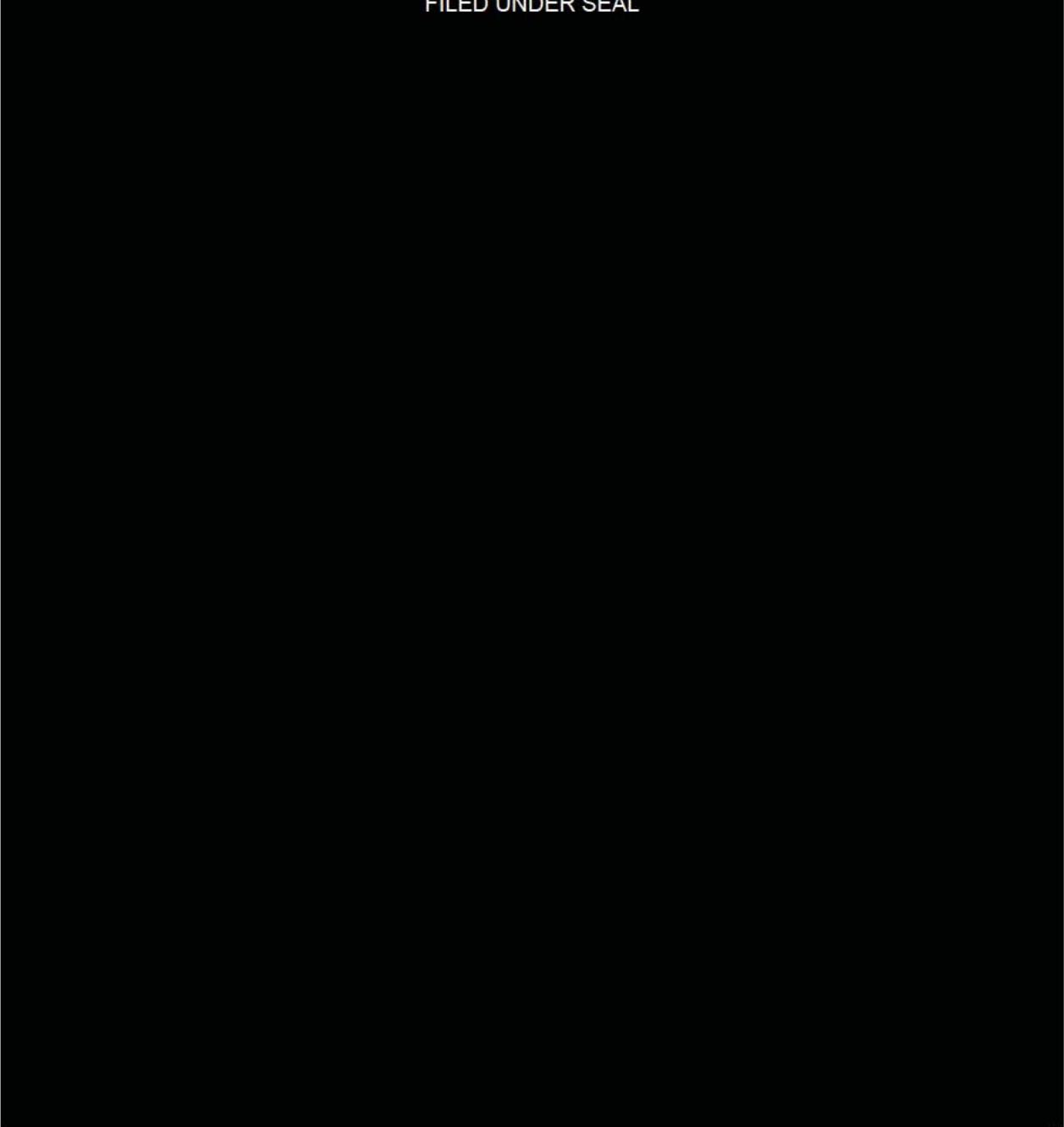
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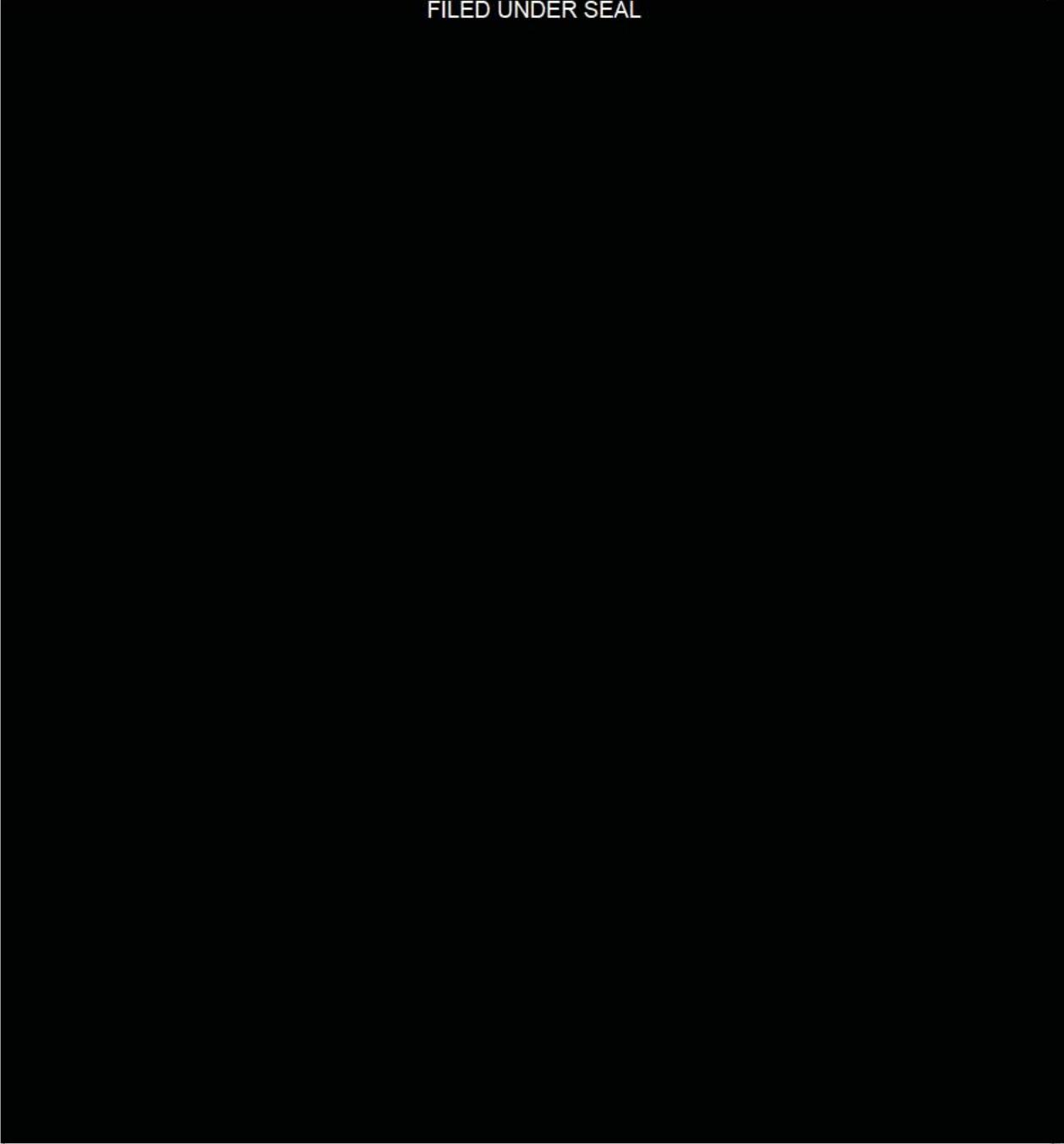
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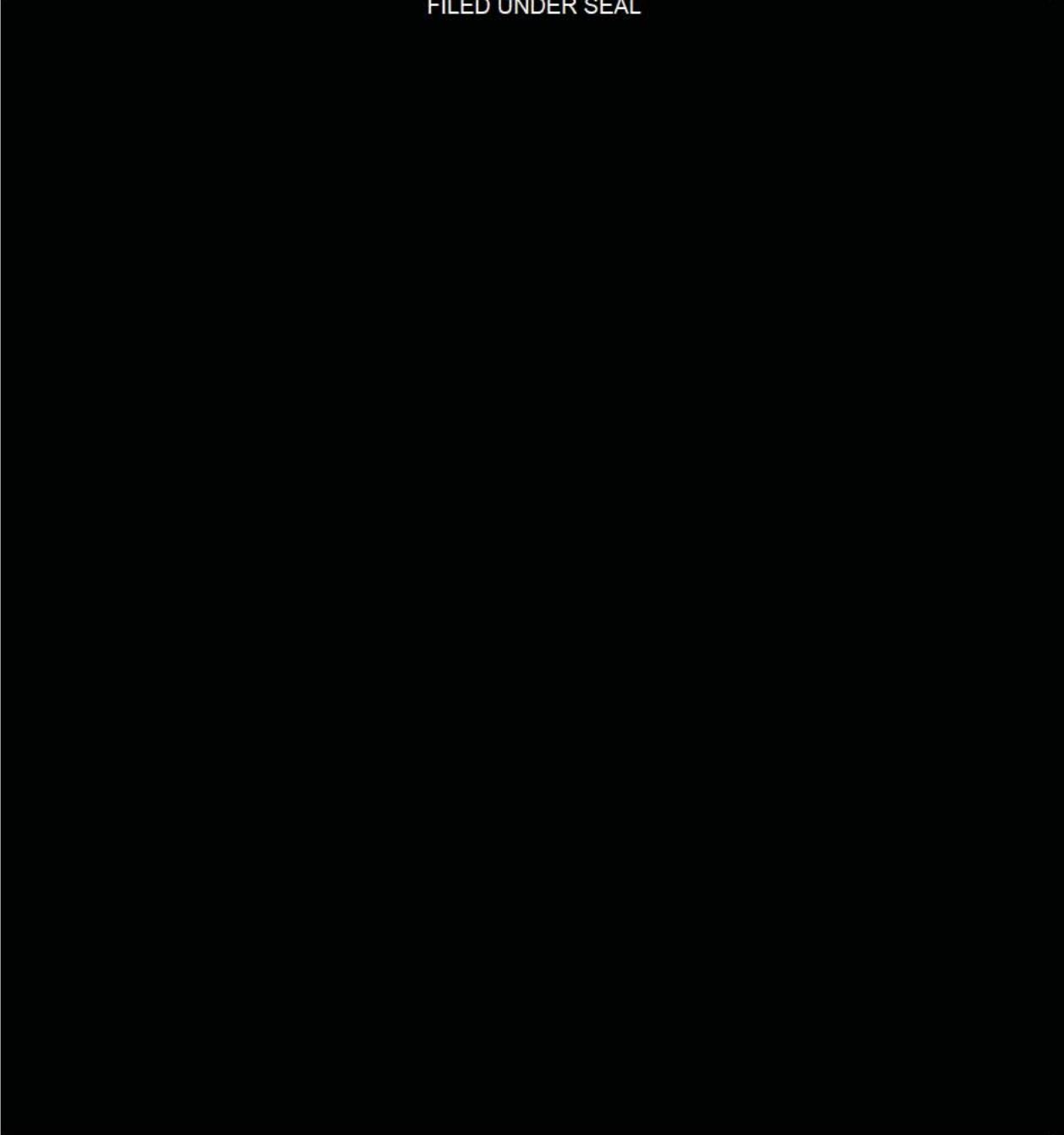
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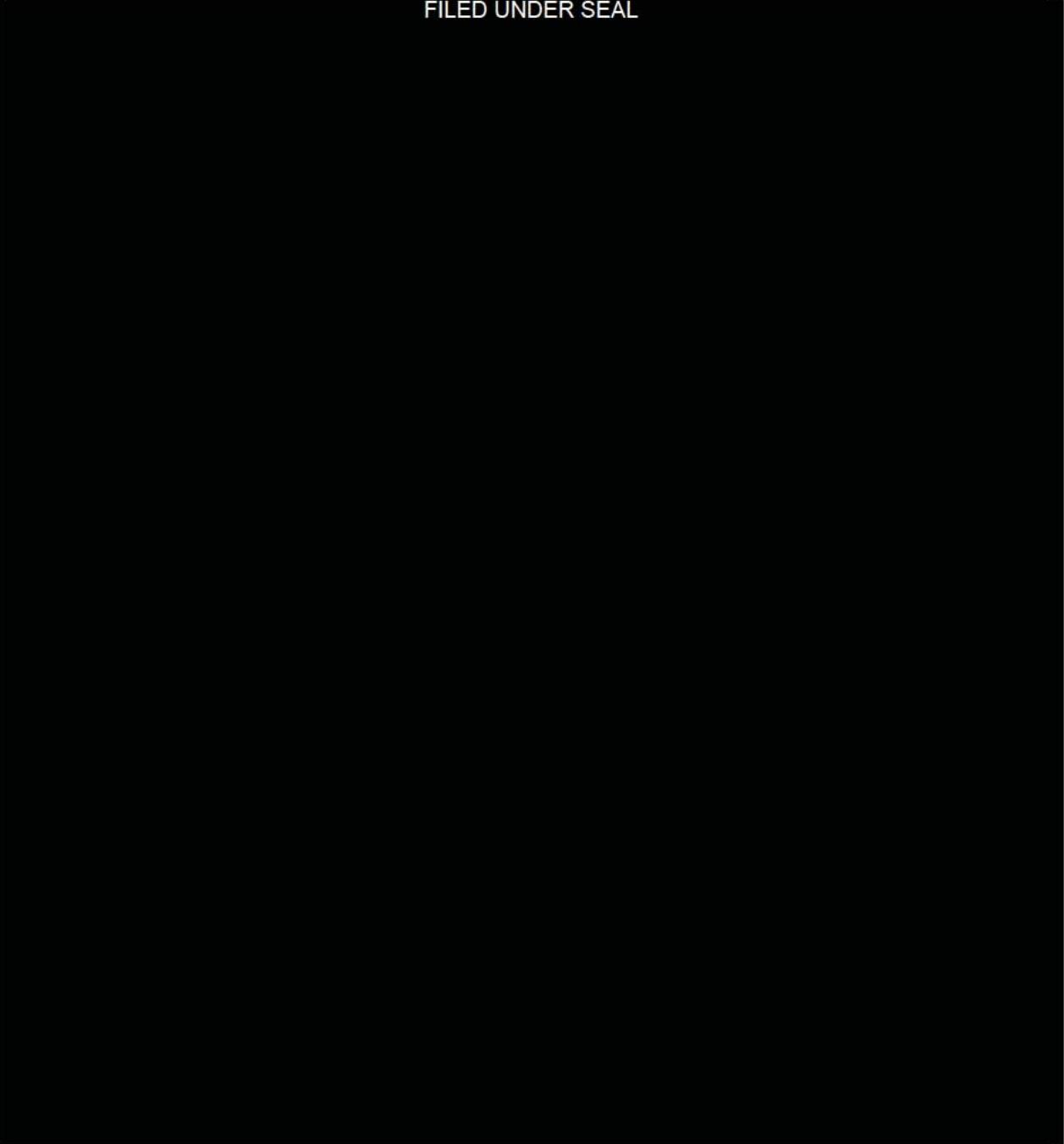
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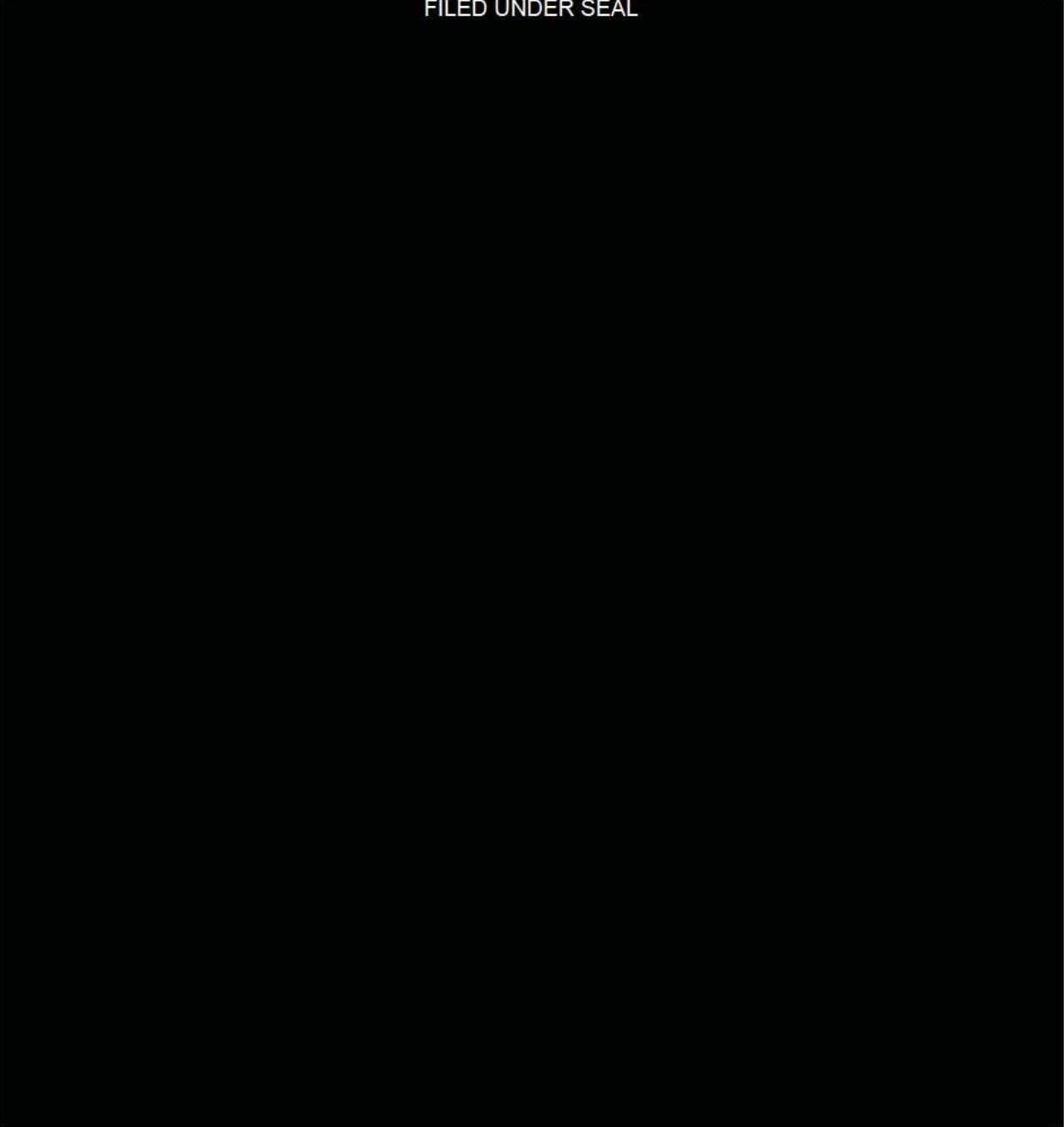
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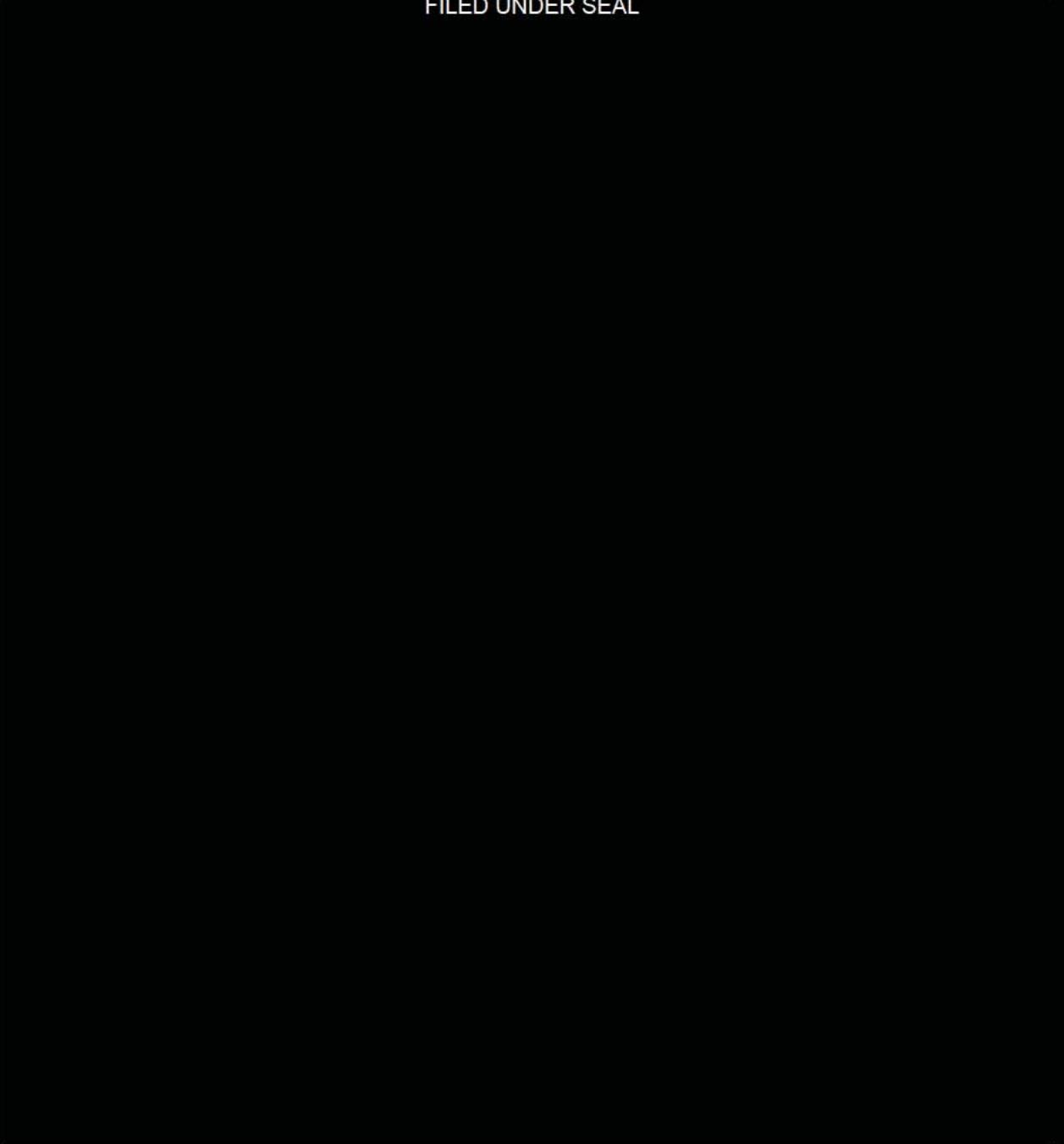
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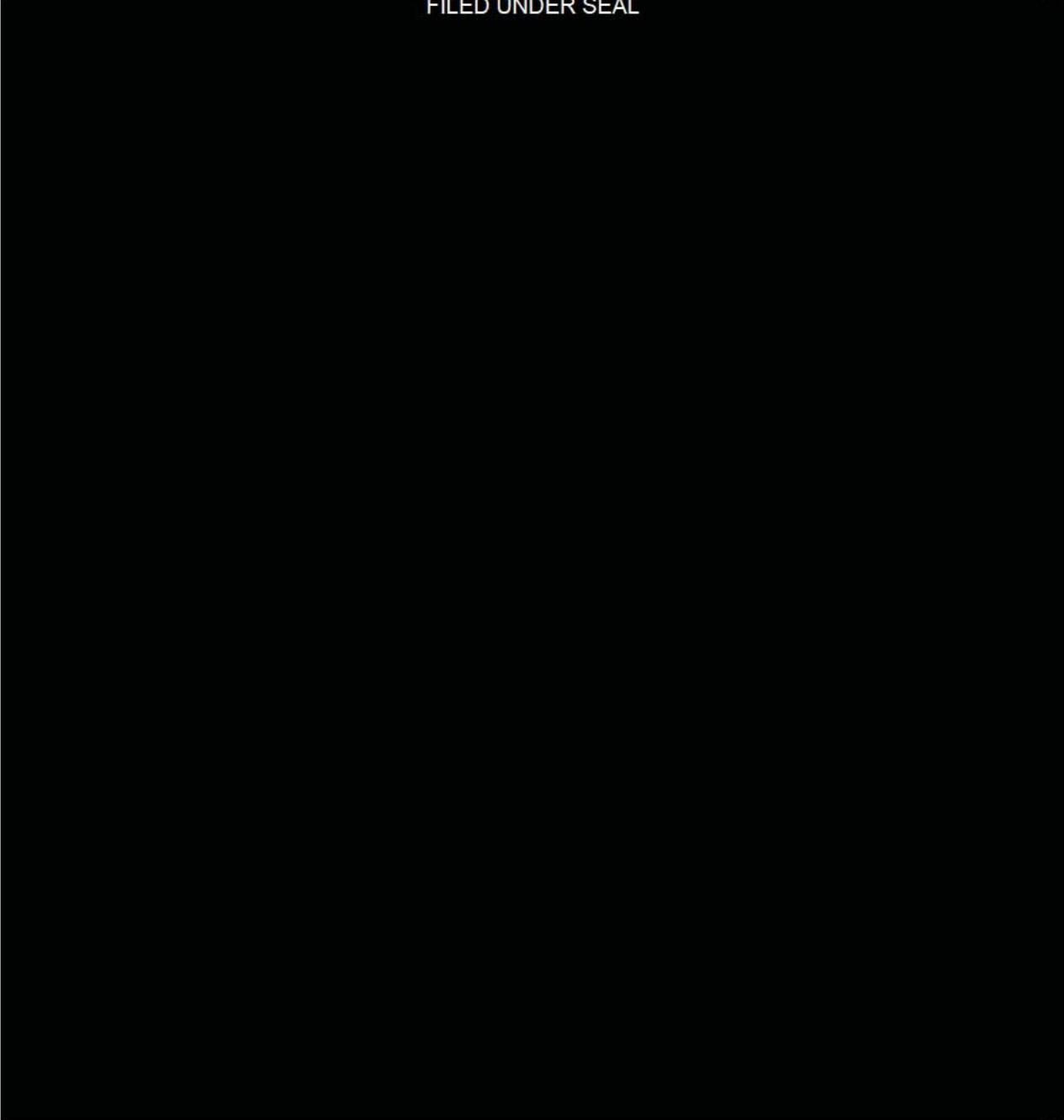
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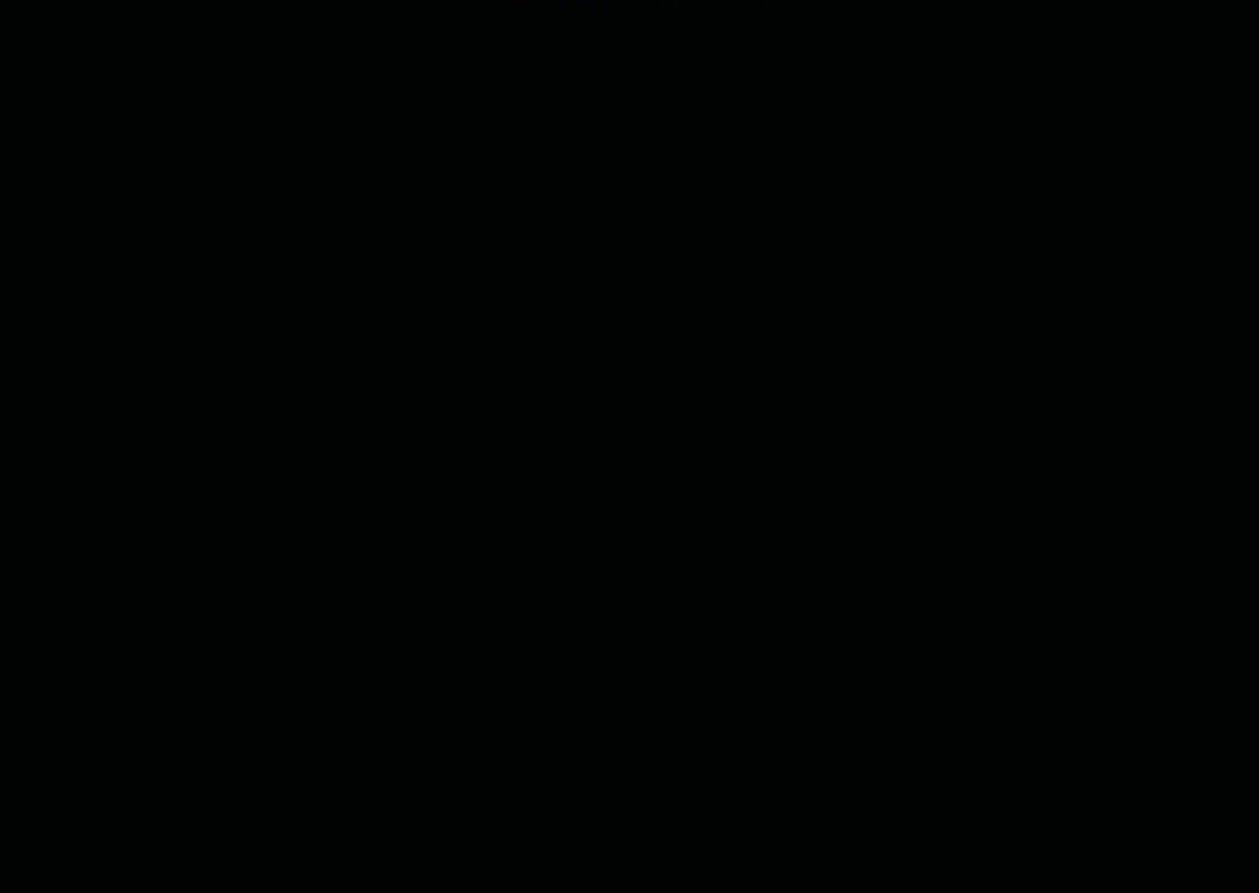
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18 (End of CONFIDENTIAL material.)

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